

EXHIBIT F

Plaintiff's Objections and Responses to
Defendants' First Requests for Production of
Documents (Nos. 1 – 138), served October 29,
2018

EXHIBIT F

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNIVERSAL ENTERTAINMENT
CORPORATION, a Japanese corporation,

Plaintiff,

vs.

ARUZE GAMING AMERICA, INC., a
Nevada corporation, KAZUO OKADA, an
individual

Defendants.

CASE NO.: 2:18-CV-585 (RFB) (GWF)

**PLAINTIFF'S OBJECTIONS AND
RESPONSES TO DEFENDANTS' FIRST
REQUESTS FOR PRODUCTION OF
DOCUMENTS (NOS. 1 – 138)**

**PLAINTIFF'S OBJECTIONS AND RESPONSES TO DEFENDANTS' FIRST REQUESTS
FOR PRODUCTION OF DOCUMENTS (NOS. 1 – 138)**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Plaintiff Universal Entertainment Corp. ("UEC" or "Plaintiff") hereby submits the following Objections and Responses to "Aruze Gaming America, Inc. and Kazuo Okada's Requests for Production of Documents (First Set)." Other parties that have been named by Defendants' in its Counterclaims have not filed a Reply or otherwise moved pursuant to Rule 12. Accordingly, these parties are not under any obligation to provide

1 objections and responses or to produce any information at this time. Therefore, the below objections
2 and responses and any documents produced pursuant hereto are on behalf of Plaintiff Universal
3 Entertainment Corp. alone.

4 These objections and responses are made on the basis of information currently available and
5 without prejudice to the right to produce evidence of any subsequently discovered fact or information,
6 to add, modify or otherwise change, amend or supplement its response as appropriate or to correct
7 any inadvertent errors, mistakes or omissions.

8 **GENERAL OBJECTIONS**

9 1. Plaintiff incorporates by reference these General Objections into each and every
10 specific response below. From time to time a specific response may repeat a General Objection for
11 emphasis or for other reasons. The omission of any General Objection in any specific response to a
12 Request for Production is not intended to be and should not be construed as a waiver or limitation of
13 any General Objection to that response. The inclusion of any specific objection in a specific response
14 to a Request for Production is not intended to be and should not be construed as a waiver or limitation
15 of any General Objection or specific objection made herein or that may be asserted at another date.

16 2. Plaintiff objects to the Instructions and Definitions, to the extent they seek to impose
17 any requirement or discovery obligation on Plaintiff greater or different than those imposed by the
18 Court, the Federal Rules of Civil Procedure and/or the Local Rules of Practice in Civil Proceedings
19 before the United States District Court for the District of Nevada ("Local Rules").

20 3. Plaintiff objects to the Instructions and Definitions to the extent they seek information
21 or documents protected, privileged, immune or otherwise exempt from discovery pursuant to the
22 Court, the Federal Rules of Civil Procedure, the Local Rules or any other applicable rule, decision,
23 or law, including the attorney-client privilege, and the work product doctrine. The provision of any
24 privileged information or document by Plaintiff is unintentional, and Plaintiff does not intend to waive
25 any applicable objection or privilege as a result of such production.

26 4. Plaintiff objects to the Instructions and Definitions to the extent that they seek
27 information or documents covered under a privilege for trade secrets and other confidential and
28 proprietary information. Plaintiff will identify such documents only subject to the terms of the

1 Protective Order entered in this case to protect the confidential nature of such information and
2 documents.

3 5. Plaintiff objects to the Instructions and Definitions to the extent they seek information
4 for time periods beyond those relevant to the issues in this case as overly broad, unduly burdensome,
5 oppressive, not reasonably calculated to lead to the discovery of admissible evidence, and otherwise
6 beyond the scope of discovery under the Federal Rules of Civil Procedure and/or the Local Rules.

7 6. Plaintiff objects to the Requests for Production to the extent they constitute an abuse
8 of process, particularly when the Request is unduly burdensome in view of the cost necessary to
9 investigate and comply weighed against Defendants' need for information.

10 7. Plaintiff objects to the Requests for Production as unduly burdensome to the extent
11 that they seek information already in the possession, custody or control of the Defendants.

12 8. Plaintiff objects to the Definitions and Instructions to the extent that they seek
13 information or documents not within Plaintiff's knowledge, possession, custody or control.

14 9. Plaintiff objects to the Requests for Production to the extent that they seek the
15 discovery of information that is within the possession, custody or control of third parties.

16 10. Plaintiff objects to the Requests for Production as unduly burdensome to the extent
17 that they seek information available from public sources, which can be readily accessed by
18 Defendants.

19 11. Plaintiff objects to the Requests for Production to the extent they seek information or
20 documents to the extent that it is neither relevant to this case nor reasonably calculated to lead to the
21 discovery of admissible evidence.

22 12. Plaintiff objects to the Requests for Production to the extent they seek identification
23 of "all" or "every" fact, document, and/or persons or to the extent they seek to "fully identify" a
24 person or entity that refers or relates to a particular subject on the grounds of over breadth, undue
25 burden and expense. Plaintiff is making reasonable searches for information relevant to the issues
26 raised in this case, including documents of the type that are the subject of the Requests for Production.
27 If any additional responsive, non-privileged, non-immune, relevant information is discovered in the
28

1 course of any further or continuing searches, it will be identified and/or produced in accordance with
2 the Federal Rules of Civil Procedure and/or the Local Rules.

3 13. Plaintiff objects to the Requests for Production to the extent they call for a legal
4 opinion or conclusion in formulating a response. Any response or production of information by
5 Plaintiff shall not be construed as providing a legal conclusion regarding the meaning or application
6 of any terms or phrases used in the discovery requests.

7 14. Plaintiff objects to the Requests for Production to the extent that they call for the
8 production of information subject to the Attorney-Client Privilege, Work Product Doctrine or any
9 other similar privilege or immunity from production under the laws of the United States or any foreign
10 jurisdiction, as applicable.

11 15. Plaintiff objects to the Requests for Production to the extent that they purport to request
12 information from parties other than Plaintiff Universal Entertainment Corp. Other parties named in
13 Defendants' Counterclaims have, at the time this document was served, not filed a Reply or otherwise
14 moved the Court pursuant to Rule 12 and may in fact not properly be parties to this case's present
15 discovery plan. Accordingly, these objections and responses are made on behalf of Plaintiff Universal
16 Entertainment Corp. alone and any production of documents or other information pursuant hereto is
17 made on behalf of Plaintiff Universal Entertainment Corp. alone.

18 16. Plaintiff objects to the Requests for Production to the extent that they purport to impose
19 any burden or obligation upon Plaintiff beyond that which is required by the Federal Rules of Civil
20 Procedure, the Local Rules of the District of Nevada and the Parties' agreements regarding the
21 protocol for translation and interpretation.

22 **OBJECTIONS TO SPECIFIC DEFINITIONS AND INSTRUCTIONS**

23 1. Plaintiff incorporates by reference these Objections to Specific Definitions and
24 Instructions into each and every specific response below. From time to time a specific response may
25 repeat an objection for emphasis or for other reasons. The omission of any Objection to a Specific
26 Definition and Instruction in any specific response is not intended to be and should not be construed
27 as a waiver or limitation of any objection in that response. The inclusion of any specific objection in
28 a specific response to a Request for Production is not intended to be and should not be construed as a

1 waiver or limitation of any General Objection or specific objection made herein or that may be
2 asserted at another date.

3 2. Plaintiff objects to Instruction No. 1 as misrepresenting the Federal Rules of Civil
4 Procedure and for purporting to place a burden or obligation on Plaintiff not reflected in the Rules.
5 Defendants erroneously assert that FRCP 34(b)(2) “Plaintiff/Counter-Defendants [to] ‘organize and
6 label [produced documents] to correspond with the categories in the request.” Rule 34(b)(2),
7 however, permits a party to produce information “as they are kept in the usual course of business or
8 must organize and label them to correspond to the categories in the request.” Federal Rule of Civil
9 Procedure Rule 34(b)(2)(E)(i) (emphasis added). Plaintiff will endeavor to produce documents and
10 other information in the manner that they are maintained in the ordinary course of business and/or
11 permit Defendants to inspect such documents and other information. Plaintiff further notes that
12 Instruction No. 1 contradicts Instruction No. 14 in this regard.

13 3. Plaintiff objects to the definitions supplied in Instruction No. 2 of “AGA,” “Aruze”
14 “Okada Holdings” and “UEC” as vague, ambiguous and overly broad to the extent it purports to
15 include “each of their respective current and former officers, directors, agents, attorneys, accountants,
16 employees, representatives, partners, consultants, contractors, advisors, and other persons occupying
17 similar positions or performing similar functions, and all other persons acting or purporting to act on
18 its behalf or under its control.” Similarly, Plaintiff objects to Instruction No. 5 that purports to equate
19 “persons and other entities” with their “agents, employees, representatives and attorneys.”

20 4. Plaintiff objects to the definition in Instruction No. 2 of “concerning” as vague,
21 ambiguous and overly broad to the extent it purports to include all of the following meanings and
22 connotations: “constituting, relating to, pertaining to, referring to, alluding to, responding to, in
23 connection with, commenting on, in response to, regarding, explaining, discussing, showing,
24 describing, studying, reflecting, analyzing, supporting or contradicting.” Plaintiff will interpret the
25 word “concerning” as it is commonly understood in ordinary usage.

26 5. Plaintiff objects to the definitions in Instruction No. 2 of “Documents” and
27 “Communications” as being vague, ambiguous and overly broad and imposing a burden on Plaintiff
28 greater than that imposed by the Federal Rules of Civil Procedure or the Local Rules. The supplied

1 definitions are vague and circular and/or nonsensical. As just one example, Defendants purport to
2 define a “document” as “including any physical things” when “tangible things” are considered a
3 separate category of production distinct from documents pursuant to Federal Rule of Civil Procedure
4 34(a)(1)(A) and (B). Plaintiffs will produce (subject to its objections) documents falling under the
5 definition set forth in Rule 34(a)(1)(A). If a specific request through context indicates that a “tangible
6 thing” should be produced in response to a specific request, Plaintiff will alert Defendants to make
7 arrangements for inspection or the production of a sample.

8 6. Plaintiff objects to the supplied definitions in Instruction No. 4 of the words “and” and
9 “or” as vague, ambiguous, circular and overly broad. Similarly, Plaintiff objects to Instruction No. 3
10 that requests terms to be read as simultaneously singular and plural as vague, ambiguous, circular and
11 over broad. Plaintiff will interpret these terms according to their ordinary usage.

12 7. Plaintiff objects to Instruction No. 7 relating to the production of privileged
13 information or information subject to the work product doctrine to the extent that it exceeds the
14 obligations imposed on Plaintiff by Rule 26 of the Federal Rules of Civil Procedure. Similarly,
15 Plaintiff objects to Instruction Nos. 8-9 regarding the redaction of document and the instructions
16 relating to the logging of documents that no longer exist. Such instructions seek to impose an
17 obligation on Plaintiff greater than required by the Federal Rules of Civil Procedure or the Local
18 Rules for the District of Nevada. Further, the information requested by these instructions maybe
19 outside of the custody or control of Plaintiff or simply unknown or unknowable even subsequent to a
20 reasonable investigation.

21 8. Plaintiff objects to Instruction No. 10 to the extent it purports to impose any burden or
22 obligation upon Plaintiff beyond that which is required by the Federal Rules of Civil Procedure, the
23 Local Rules of the District of Nevada and the Parties’ agreements regarding the production of
24 electronically stored information.

25 9. Plaintiff objects to Instruction No. 12 to the extent it purports to impose a burden or
26 oppression on Plaintiff beyond that which is required by the Federal Rules of Civil Procedure or the
27 Local Rules of the District of Nevada.

OBJECTIONS AND RESPONSES

General

REQUEST NO. 1:

Please produce copies of all Documents identified in and/or which tend to support, refute, or are in any way relevant to the Second Amended Complaint filed on August 23, 2018.

OBJECTIONS AND RESPONSE:

Plaintiff incorporates each of its General Objections and its Objections to Definitions and Instructions as if fully set forth herein.

Plaintiff objects to this request as vague and ambiguous in its use of the following terms, which are subject to more than one reasonable interpretation: “all Documents,” and “tend to support, refute, or are in any way relevant.” Plaintiff objects to this request to the extent it purports to request information that is in the possession, custody or control of third parties to this lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff objects to this request to the extent it purports to request information that is within the public domain and accordingly is at least as easily obtained by the Defendants. Plaintiff objects to this request to the extent that it purports to request information that is outside of the possession, custody or control of Plaintiff. Plaintiff objects to this request as overly burdensome to the extent it purports to request documents that are, or should be, within the possession custody and control of one or more of the Defendants. Plaintiff objects to this request as overly burdensome to the extent it purports to duplicate or overlap in subject matter with other requests propounded by the Defendants.

Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and search, Plaintiff will produce responsive, non-privileged information within its custody and control to the extent that such information exists.

REQUEST NO. 2:

Please produce all Documents reviewed or relied upon in connection with the filing of the Second Amended Complaint in this litigation.

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OBJECTIONS AND RESPONSE:

Plaintiff incorporates each of its General Objections and Objections to Definitions and Instructions as if fully set forth herein.

Plaintiff objects to this request as vague and ambiguous in its use of the following terms, which are subject to more than one reasonable interpretation: “all Documents” and “reviewed.”

Plaintiff objects to this request as vague and ambiguous in its use of the following terms, which are subject to more than one reasonable interpretation: “filing”. Plaintiff will undertake to interpret these terms as they would in ordinary usage given the context. Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it purports to request the production of “all” or “each and every” document in the requested category of documents. Such a request for all documents is unduly burdensome in particular given the extremely broad definitions of “Document” supplied by Defendants and, consequently, the request purports to require Plaintiff to collect documents from potentially every employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a reasonable list of custodians whose job responsibilities would indicate that they were in possession of potentially responsive information. Plaintiff objects to this request to the extent it purports to request the production of information subject to the attorney-client privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff objects to this request to the extent it purports to request information that is in the possession, custody or control of third parties to this lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff objects to this request to the extent that it purports to request information that is outside of the possession, custody or control of Plaintiff. Plaintiff objects to this request as overly burdensome to the extent it purports to request documents that are, or should be, within the possession custody and control of one or more of the Defendants.

Plaintiff objects to this request as overly burdensome to the extent it purports to duplicate or overlap in subject matter with other requests propounded by the Defendants.

Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and search, Plaintiff will produce responsive, non-privileged information within its custody and control

1 to the extent that such information exists.

2
3 **REQUEST NO. 3:**

4 Please produce all Documents on which UEC intends to rely to support its positions Concerning
5 any claim or defense in this action.

6 **OBJECTIONS AND RESPONSE:**

7 Plaintiff incorporates each of its General Objections and Objections to Definitions and
8 Instructions as if fully set forth herein.

9 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
10 which are subject to more than one reasonable interpretation: “all Documents.” Plaintiff objects to
11 this request to the extent it purports to request information that is in the possession, custody or
12 control of third parties to this lawsuit and not within the possession, custody and control of Plaintiff.
13 Plaintiff objects to this request to the extent it purports to request information that is within the
14 public domain and accordingly is at least as easily obtained by the Defendants. Plaintiff objects to
15 this request to the extent that it purports to request information that is outside of the possession,
16 custody or control of Plaintiff. Plaintiff objects to this request as overly burdensome to the extent it
17 purports to request documents that are, or should be, within the possession custody and control of
18 one or more of the Defendants. Plaintiff objects to this request as overly burdensome to the extent
19 it purports to duplicate or overlap in subject matter with other requests propounded by the
20 Defendants. Plaintiff further objects to this request as premature inasmuch as discovery in this case
21 has just begun and the Plaintiff has not yet completed its investigation of the relevant facts, the
22 Court has not rendered any rulings or claim constructions and the parties have not completed expert
23 discovery.

24 Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and
25 search, Plaintiff will produce responsive, non-privileged information within its custody and control
26 to the extent that such information exists. Further Plaintiff’s production of certain of the requested
27 information will be made when such production is required pursuant to the Court’s Case
28 Management Order and the Patent Local Rules of the District of Nevada.

REQUEST NO. 4:

Please produce all Documents sufficient to identify persons who have knowledge Concerning any claim or defense in this action.

OBJECTIONS AND RESPONSE:

Plaintiff incorporates each of its General Objections and Objections to Definitions and Instructions as if fully set forth herein.

Plaintiff objects to this request as vague and ambiguous in its use of the following terms, which are subject to more than one reasonable interpretation: “Documents ... Concerning.” Plaintiff will undertake to interpret these terms as they would in ordinary usage given the context. Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it purports to request the production of “all” or “each and every” document in the requested category of documents. Such a request for all documents is unduly burdensome in particular given the extremely broad definitions of “Document” supplied by Defendants and, consequently, the request purports to require Plaintiff to collect documents from potentially every employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a reasonable list of custodians whose job responsibilities would indicate that they were in possession of potentially responsive information. Plaintiff objects to this request to the extent it purports to request information that is in the possession, custody or control of third parties to this lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff objects to this request to the extent it purports to request information that is within the public domain and accordingly is at least as easily obtained by the Defendants. Plaintiff objects to this request to the extent that it purports to request information that is outside of the possession, custody or control of Plaintiff. Plaintiff objects to this request as overly burdensome to the extent it purports to request documents that are, or should be, within the possession custody and control of one or more of the Defendants. Plaintiff objects to this request as overly burdensome to the extent it purports to duplicate or overlap in subject matter with other requests propounded by the Defendants. Plaintiff further objects to this request as premature inasmuch as discovery in this case has just begun and the Plaintiff has not yet completed its investigation of the relevant facts, the Court has not rendered any rulings or claim

1 constructions and the parties have not completed expert discovery.

2 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
3 search, Plaintiff will produce responsive, non-privileged information within its custody and control
4 to the extent that such information exists. Further Plaintiff's production of certain of the requested
5 information will be made when such production is required pursuant to the Court's Case
6 Management Order and the Patent Local Rules of the District of Nevada.

7
8 **REQUEST NO. 5:**

9 Please produce all Documents Concerning, or on which UEC intends to rely to establish, elements
10 of UEC' case where UEC bears the burden of proof.

11 **OBJECTIONS AND RESPONSE:**

12 Plaintiff incorporates each of its General Objections and Objections to Definitions and
13 Instructions as if fully set forth herein.

14 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
15 which are subject to more than one reasonable interpretation: "all Documents" "Concerning."
16 Plaintiff will undertake to interpret these terms as they would in ordinary usage given the
17 context. Plaintiff objects to this request to the extent it purports to request information that is in the
18 possession, custody or control of third parties to this lawsuit and not within the possession, custody
19 and control of Plaintiff. Plaintiff objects to this request to the extent it purports to request
20 information that is within the public domain and accordingly is at least as easily obtained by the
21 Defendants. Plaintiff objects to this request to the extent that it purports to request information that
22 is outside of the possession, custody or control of Plaintiff. Plaintiff objects to this request as overly
23 burdensome to the extent it purports to request documents that are, or should be, within the
24 possession custody and control of one or more of the Defendants. Plaintiff objects to this request
25 as overly burdensome to the extent it purports to duplicate or overlap in subject matter with other
26 requests propounded by the Defendants. Plaintiff further objects to this request as premature
27 inasmuch as discovery in this case has just begun and the Plaintiff has not yet completed its
28 investigation of the relevant facts, the Court has not rendered any rulings or claim constructions and

1 the parties have not completed expert discovery.

2 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
3 search, Plaintiff will produce responsive, non-privileged information within its custody and control
4 to the extent that such information exists.

5
6 **REQUEST NO. 6:**

7 Please produce all exhibits that UEC plans to use at any hearing or at the trial of this case, including
8 Documents, physical samples, or demonstratives of any kind, and all Documents prepared by any
9 person UEC expects to call to testify as an expert at trial, including but not limited to reports,
10 correspondence, memoranda, charts, photographs, diagrams, drawings, tables, notes or similar
11 Documents, as well as Documents though not written by experts, that UEC intends to offer into
12 evidence through an expert at trial.

13 **OBJECTIONS AND RESPONSE:**

14 Plaintiff incorporates each of its General Objections and Objections to Definitions and
15 Instructions as if fully set forth herein.

16 Plaintiff objects to this request to the extent it purports to request information that is in the
17 possession, custody or control of third parties to this lawsuit and not within the possession, custody
18 and control of Plaintiff. Plaintiff objects to this request to the extent it purports to request
19 information that is within the public domain and accordingly is at least as easily obtained by the
20 Defendants. Plaintiff objects to this request to the extent that it purports to request information that
21 is outside of the possession, custody or control of Plaintiff. Plaintiff objects to this request as overly
22 burdensome to the extent it purports to request documents that are, or should be, within the
23 possession custody and control of one or more of the Defendants. Plaintiff objects to this request
24 as overly burdensome to the extent it purports to duplicate or overlap in subject matter with other
25 requests propounded by the Defendants.

26 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
27 search, Plaintiff will produce responsive, non-privileged information within its custody and control
28 to the extent that such information exists.

REQUEST NO. 7:

Please produce each and every written or recorded statement, affidavit, affirmation or declaration Concerning any of the allegations in the Second Amended Complaint that UEC or anyone acting on behalf of UEC has obtained.

OBJECTIONS AND RESPONSE:

Plaintiff incorporates each of its General Objections and Objections to Definitions and Instructions as if fully set forth herein.

Plaintiff objects to this request as vague and ambiguous in its use of the following terms, which are subject to more than one reasonable interpretation: “anyone acting on behalf of UEC has obtained.” Plaintiff will undertake to interpret these terms as they would in ordinary usage given the context. Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it purports to request the production of “all” or “each and every” document in the requested category of documents. Such a request for all documents is unduly burdensome in particular given the extremely broad definitions of “Document” supplied by Defendants and, consequently, the request purports to require Plaintiff to collect documents from potentially every employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a reasonable list of custodians whose job responsibilities would indicate that they were in possession of potentially responsive information. Plaintiff objects to this request to the extent it purports to request information that is in the possession, custody or control of third parties to this lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff objects to this request to the extent it purports to request information that is within the public domain and accordingly is at least as easily obtained by the Defendants. Plaintiff objects to this request to the extent that it purports to request information that is outside of the possession, custody or control of Plaintiff. Plaintiff objects to this request as overly burdensome to the extent it purports to request documents that are, or should be, within the possession custody and control of one or more of the Defendants. Plaintiff objects to this request as overly burdensome to the extent it purports to duplicate or overlap in subject matter with other requests propounded by the Defendants.

Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and

1 search, Plaintiff will produce responsive, non-privileged information within its custody and control
2 to the extent that such information exists.

3
4 **REQUEST NO. 8:**

5 Please produce all Documents on which UEC relied in the preparation of UEC's response or
6 supplemental response to any interrogatory, request for admission, or request for production served
7 by Defendants in this Action, including any Documents identified in, requested to be identified in,
8 used, or relied upon in the preparation of any such UEC response or supplemental response.

9 **OBJECTIONS AND RESPONSE:**

10 Plaintiff incorporates each of its General Objections and Objections to Definitions and
11 Instructions as if fully set forth herein.

12 Plaintiff objects to this request to the extent it purports to request the production of
13 information subject to the attorney-client privilege, the work product doctrine or any other
14 recognized privilege or immunity. Plaintiff further objects to this request as specifically requesting
15 the work product protected thoughts and mental impressions of Plaintiff's counsel. Plaintiff objects
16 to this request to the extent it purports to request information that is within the public domain and
17 accordingly is at least as easily obtained by the Defendants. Plaintiff objects to this request as
18 overly burdensome to the extent it purports to request documents that are, or should be, within the
19 possession custody and control of one or more of the Defendants. Plaintiff objects to this request as
20 overly burdensome to the extent it purports to duplicate or overlap in subject matter with other
21 requests propounded by the Defendants.

22 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
23 search, Plaintiff will produce responsive, non-privileged information within its custody and control
24 to the extent that such information exists.

25
26 **REQUEST NO. 9:**

27 Please produce all Documents evidencing any damages incurred by Plaintiff as it relates to any
28 claim alleged in the Second Amended Complaint.

OBJECTIONS AND RESPONSE:

Plaintiff incorporates each of its General Objections and Objections to Definitions and Instructions as if fully set forth herein.

Plaintiff objects to this request to the extent it purports to request the production of information subject to the attorney-client privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff objects to this request to the extent that it purports to request information that is outside of the possession, custody or control of Plaintiff. Plaintiff objects to this request as overly burdensome to the extent it purports to request documents that are, or should be, within the possession custody and control of one or more of the Defendants. Plaintiff objects to this request as overly burdensome to the extent it purports to duplicate or overlap in subject matter with other requests propounded by the Defendants. Plaintiff further objects to this request as premature inasmuch as discovery in this case has just begun and the Plaintiff has not yet completed its investigation of the relevant facts, the Court has not rendered any rulings or claim constructions and the parties have not completed expert discovery. Plaintiff further objects to this request to the extent that damages suffered by Plaintiff are ongoing and accordingly this request could not be completely answered until infringement ceases.

Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and search, Plaintiff will produce responsive, non-privileged information within its custody and control to the extent that such information exists.

REQUEST NO. 10:

Please produce all Documents Concerning any document retention or destruction policy of UEC or any such policy governing UEC employees.

OBJECTIONS AND RESPONSE:

Plaintiff incorporates each of its General Objections and Objections to Definitions and Instructions as if fully set forth herein.

Plaintiff objects to this request as vague and ambiguous in its use of the following terms, which are subject to more than one reasonable interpretation: "all Documents Concerning" and

1 “destruction policy.” Plaintiff will undertake to interpret these terms as they would in ordinary
2 usage given the context. Plaintiff objects to this request to the extent it purports to request the
3 production of information subject to the attorney-client privilege, the work product doctrine or any
4 other recognized privilege or immunity. Plaintiff further objects to this request as premature
5 inasmuch as discovery in this case has just begun and the Plaintiff has not yet completed its
6 investigation of the relevant facts, the Court has not rendered any rulings or claim constructions and
7 the parties have not completed expert discovery.

8 Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and
9 search, Plaintiff will produce responsive, non-privileged information within its custody and control
10 to the extent that such information exists.

11
12 **REQUEST NO. 11:**

13 Please produce all Documents containing any facts or data that UEC, or anyone on its behalf
14 including attorneys, provided to any testifying expert witness that the expert considered in forming
15 the opinions to be expressed.

16 **OBJECTIONS AND RESPONSE:**

17 Plaintiff incorporates each of its General Objections and Objections to Definitions and
18 Instructions as if fully set forth herein.

19 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
20 which are subject to more than one reasonable interpretation: “all Documents containing any facts
21 or data.” Plaintiff notes that same facts may be contained in documents that are not relied upon and
22 those that are relied upon. Further, Plaintiff further objects to this request as premature inasmuch as
23 discovery in this case has just begun and the Plaintiff has not yet completed its investigation of the
24 relevant facts, the Court has not rendered any rulings or claim constructions and the parties have not
25 completed expert discovery.

26 Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and
27 search, Plaintiff will produce responsive, non-privileged information within its custody and control
28 to the extent that such information exists.

1 **REQUEST NO. 12:**

2 Please produce all Documents containing any assumptions that UEC, or anyone on its behalf
3 including attorneys, provided to any testifying expert witness that the expert relied on in forming
4 the opinions to be expressed from January 1, 2017 to present.

5 **OBJECTIONS AND RESPONSE:**

6 Plaintiff incorporates each of its General Objections and Objections to Definitions and
7 Instructions as if fully set forth herein.

8 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
9 which are subject to more than one reasonable interpretation: “that the expert relied on in forming
10 the opinions to be expressed” and “containing any assumptions.” Plaintiff will undertake to interpret
11 these terms as they would in ordinary usage given the context. Plaintiff objects to this request as
12 overly broad and unduly burdensome inasmuch as it purports to request the production of “all” or
13 “each and every” document in the requested category of documents. Such a request for all
14 documents is unduly burdensome in particular given the extremely broad definitions of “Document”
15 supplied by Defendants and, consequently, the request purports to require Plaintiff to collect
16 documents from potentially every employee, agent or attorney of Plaintiff rather than conduct a
17 reasonable investigation that collects responsive documents from a reasonable list of custodians
18 whose job responsibilities would indicate that they were in possession of potentially responsive
19 information. Plaintiff objects to this request as overly burdensome to the extent it purports to
20 duplicate or overlap in subject matter with other requests propounded by the Defendants. Plaintiff
21 further objects to this request as premature inasmuch as discovery in this case has just begun and the
22 Plaintiff has not yet completed its investigation of the relevant facts, the Court has not rendered any
23 rulings or claim constructions and the parties have not completed expert discovery.

24 Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and
25 search, Plaintiff will produce responsive, non-privileged information within its custody and control
26 to the extent that such information exists.

27 //

28 //

*Corporate Structure/History***REQUEST NO. 13:**

Please produce all Documents Concerning the corporate structure, organization, or business of UEC, including without limitation, articles of incorporation, bylaws, organizational charts, decision-making authority charts, business plans, and corporate reports and filings.

OBJECTIONS AND RESPONSE:

Plaintiff incorporates each of its General Objections and Objections to Definitions and Instructions as if fully set forth herein.

Plaintiff objects to this request as vague and ambiguous in its use of the following terms, which are subject to more than one reasonable interpretation: “business of UEC,” “decision making authority charts.” Plaintiff will undertake to interpret these terms as they would in ordinary usage given the context. Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it purports to request the production of “all” or “each and every” document in the requested category of documents. Such a request for all documents is unduly burdensome in particular given the extremely broad definitions of “Document” supplied by Defendants and, consequently, the request purports to require Plaintiff to collect documents from potentially every employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a reasonable list of custodians whose job responsibilities would indicate that they were in possession of potentially responsive information. Plaintiff objects to this request to the extent it purports to request information that is neither relevant to the subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff objects to this request to the extent it purports to request information that is within the public domain and accordingly is at least as easily obtained by the Defendants. Plaintiff objects to this request to the extent that it is not reasonably limited to a time period relevant to the causes of action and claims at issue in this lawsuit. Plaintiff objects to this request as overly burdensome to the extent it purports to request documents that are, or should be, within the possession custody and control of one or more of the Defendants. Plaintiff objects to this request as overly burdensome to the extent it purports to duplicate or overlap in subject matter with other requests propounded by the Defendants.

1 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
2 search, Plaintiff will produce responsive, non-privileged information within its custody and control
3 to the extent that such information exists.

4
5 **REQUEST NO. 14:**

6 Please produce all Documents Concerning amendments UEC has made to its corporate Documents,
7 including but not limited to its articles of incorporation and bylaws, since January 1, 2007.

8 **OBJECTIONS AND RESPONSE:**

9 Plaintiff incorporates each of its General Objections and Objections to Definitions and
10 Instructions as if fully set forth herein.

11 Plaintiff objects to this request as vague and ambiguous in its use of the following terms, which are
12 subject to more than one reasonable interpretation: "amendments UEC has made" "Documents
13 Concerning" and "Documents." Plaintiff will undertake to interpret these terms as they would in
14 ordinary usage given the context. Plaintiff objects to this request as overly broad and unduly
15 burdensome inasmuch as it purports to request the production of "all" or "each and every"
16 document in the requested category of documents. Such a request for all documents is unduly
17 burdensome in particular given the extremely broad definitions of "Document" supplied by
18 Defendants and, consequently, the request purports to require Plaintiff to collect documents from
19 potentially every employee, agent or attorney of Plaintiff rather than conduct a reasonable
20 investigation that collects responsive documents from a reasonable list of custodians whose job
21 responsibilities would indicate that they were in possession of potentially responsive
22 information. Plaintiff objects to this request to the extent it purports to request information that is
23 neither relevant to the subject matter of this lawsuit nor reasonably calculated to lead to the
24 discovery of admissible evidence. Plaintiff objects to this request to the extent it purports to request
25 information that is within the public domain and accordingly is at least as easily obtained by the
26 Defendants. Plaintiff objects to this request to the extent that it is not reasonably limited to a time
27 period relevant to the causes of action and claims at issue in this lawsuit. Plaintiff objects to this
28 request as overly burdensome to the extent it purports to request documents that are, or should be,

1 within the possession custody and control of one or more of the Defendants. Plaintiff objects to
2 this request as overly burdensome to the extent it purports to duplicate or overlap in subject matter
3 with other requests propounded by the Defendants.

4 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
5 search, Plaintiff will produce responsive, non-privileged information within its custody and control
6 to the extent that such information exists.

7
8 **REQUEST NO. 15:**

9 Please produce all Documents Concerning the corporate structure, organization, or business of
10 Aruze, including without limitation, articles of incorporation, bylaws, organizational charts,
11 business plans, and corporate reports and filings, since January 1, 2007.

12 **OBJECTIONS AND RESPONSE:**

13 Plaintiff incorporates each of its General Objections and Objections to Definitions and
14 Instructions as if fully set forth herein.

15 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
16 which are subject to more than one reasonable interpretation: "business of Aruze". Plaintiff will
17 undertake to interpret these terms as they would in ordinary usage given the context. Plaintiff
18 objects to this request as overly broad and unduly burdensome inasmuch as it purports to request the
19 production of "all" or "each and every" document in the requested category of documents. Such a
20 request for all documents is unduly burdensome in particular given the extremely broad definitions
21 of "Document" supplied by Defendants and, consequently, the request purports to require Plaintiff
22 to collect documents from potentially every employee, agent or attorney of Plaintiff rather than
23 conduct a reasonable investigation that collects responsive documents from a reasonable list of
24 custodians whose job responsibilities would indicate that they were in possession of potentially
25 responsive information. Plaintiff objects to this request to the extent it purports to request
26 information that is neither relevant to the subject matter of this lawsuit nor reasonably calculated to
27 lead to the discovery of admissible evidence. Plaintiff objects to this request to the extent it
28 purports to request information that is within the public domain and accordingly is at least as easily

1 obtained by the Defendants. Plaintiff objects to this request to the extent that it is not reasonably
2 limited to a time period relevant to the causes of action and claims at issue in this lawsuit. Plaintiff
3 objects to this request as overly burdensome to the extent it purports to request documents that are,
4 or should be, within the possession custody and control of one or more of the Defendants. Plaintiff
5 objects to this request as overly burdensome to the extent it purports to duplicate or overlap in
6 subject matter with other requests propounded by the Defendants.

7 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
8 search, Plaintiff will produce responsive, non-privileged information within its custody and control
9 to the extent that such information exists.

10
11 **REQUEST NO. 16:**

12 Please produce all Documents Concerning amendments Aruze has made to its corporate
13 Documents, including but not limited to its articles of incorporation and bylaws, since January 1,
14 2007.

15 **OBJECTIONS AND RESPONSE:**

16 Plaintiff incorporates each of its General Objections and Objections to Definitions and
17 Instructions as if fully set forth herein.

18 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
19 which are subject to more than one reasonable interpretation: "amendments Aruze has made"
20 "Documents Concerning" and "Documents". Plaintiff will undertake to interpret these terms as
21 they would in ordinary usage given the context. Plaintiff objects to this request as overly broad and
22 unduly burdensome inasmuch as it purports to request the production of "all" or "each and every"
23 document in the requested category of documents. Such a request for all documents is unduly
24 burdensome in particular given the extremely broad definitions of "Document" supplied by
25 Defendants and, consequently, the request purports to require Plaintiff to collect documents from
26 potentially every employee, agent or attorney of Plaintiff rather than conduct a reasonable
27 investigation that collects responsive documents from a reasonable list of custodians whose job
28 responsibilities would indicate that they were in possession of potentially responsive information.

Plaintiff objects to this request to the extent it purports to request information that is neither relevant to the subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff objects to this request to the extent it purports to request information that is within the public domain and accordingly is at least as easily obtained by the Defendants. Plaintiff objects to this request to the extent that it is not reasonably limited to a time period relevant to the causes of action and claims at issue in this lawsuit. Plaintiff objects to this request as overly burdensome to the extent it purports to request documents that are, or should be, within the possession custody and control of one or more of the Defendants. Plaintiff objects to this request as overly burdensome to the extent it purports to duplicate or overlap in subject matter with other requests propounded by the Defendants.

Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and search, Plaintiff will produce responsive, non-privileged information within its custody and control to the extent that such information exists.

REQUEST NO. 17:

Please produce all Documents Concerning Okada Holdings' appointment of Okada as nominee director in UEC.

OBJECTIONS AND RESPONSE:

Plaintiff incorporates each of its General Objections and Objections to Definitions and Instructions as if fully set forth herein.

Plaintiff objects to this request to the extent it purports to request information that is neither relevant to the subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff objects to this request to the extent it purports to request information that is within the public domain and accordingly is at least as easily obtained by the Defendants. Plaintiff objects to this request to the extent that it is not reasonably limited to a time period relevant to the causes of action and claims at issue in this lawsuit. Plaintiff objects to this request as overly burdensome to the extent it purports to request documents that are, or should be, within the possession custody and control of one or more of the Defendants. Plaintiff objects to this request

1 as overly burdensome to the extent it purports to duplicate or overlap in subject matter with other
2 requests propounded by the Defendants.

3 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
4 search, Plaintiff will produce responsive, non-privileged information within its custody and control
5 to the extent that such information exists.

6
7 **REQUEST NO. 18:**

8 Please produce all Documents Concerning the sale of AGA by UEC to Okada which was
9 consummated on March 31, 2009.

10 **OBJECTIONS AND RESPONSE:**

11 Plaintiff incorporates each of its General Objections and Objections to Definitions and
12 Instructions as if fully set forth herein.

13 Plaintiff objects to this request as vague and ambiguous in its use of the following terms, which are
14 subject to more than one reasonable interpretation: "sale of AGA by UEC". Plaintiff will
15 undertake to interpret these terms as they would in ordinary usage given the context. Plaintiff
16 objects to this request as overly broad and unduly burdensome inasmuch as it purports to request the
17 production of "all" or "each and every" document in the requested category of documents. Such a
18 request for all documents is unduly burdensome in particular given the extremely broad definitions
19 of "Document" supplied by Defendants and, consequently, the request purports to require Plaintiff
20 to collect documents from potentially every employee, agent or attorney of Plaintiff rather than
21 conduct a reasonable investigation that collects responsive documents from a reasonable list of
22 custodians whose job responsibilities would indicate that they were in possession of potentially
23 responsive information. Plaintiff objects to this request to the extent it purports to request
24 information that is within the public domain and accordingly is at least as easily obtained by the
25 Defendants. Plaintiff objects to this request to the extent that it purports to request information that
26 is outside of the possession, custody or control of Plaintiff. Plaintiff objects to this request as overly
27 burdensome to the extent it purports to request documents that are, or should be, within the
28 possession custody and control of one or more of the Defendants. Plaintiff objects to this request

1 as overly burdensome to the extent it purports to duplicate or overlap in subject matter with other
2 requests propounded by the Defendants.

3 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
4 search, Plaintiff will produce responsive, non-privileged information within its custody and control
5 to the extent that such information exists.

6
7 **REQUEST NO. 19:**

8 Please produce all Documents in support of UEC's contention in paragraph 59 of the Second
9 Amended Complaint that the transfer of the remaining stock in AGA owned by UEC to Okada was
10 "completed in March 2010."

11 **OBJECTIONS AND RESPONSE:**

12 Plaintiff incorporates each of its General Objections and Objections to Definitions and
13 Instructions as if fully set forth herein.

14 Plaintiff objects to this request to the extent it purports to request information that is within
15 the public domain and accordingly is at least as easily obtained by the Defendants. Plaintiff objects
16 to this request to the extent that it purports to request information that is outside of the possession,
17 custody or control of Plaintiff. Plaintiff objects to this request as overly burdensome to the extent it
18 purports to request documents that are, or should be, within the possession custody and control of
19 one or more of the Defendants.

20 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
21 search, Plaintiff will produce responsive, non-privileged information within its custody and control
22 to the extent that such information exists.

23
24 **REQUEST NO. 20:**

25 Please produce all Documents Concerning UEC's appointment of Okada as nominee director in
26 Tiger Resorts Asia Limited dated April 8, 2014.

27 **OBJECTIONS AND RESPONSE:**

28 Plaintiff incorporates each of its General Objections and Objections to Definitions and

1 Instructions as if fully set forth herein.

2 Plaintiff objects to this request to the extent it purports to request information that is neither
3 relevant to the subject matter of this lawsuit nor reasonably calculated to lead to the discovery of
4 admissible evidence. Plaintiff objects to this request to the extent it purports to request information
5 that is in the possession, custody or control of third parties to this lawsuit and not within the
6 possession, custody and control of Plaintiff. Plaintiff objects to this request to the extent it purports
7 to request information that is within the public domain and accordingly is at least as easily obtained
8 by the Defendants. Plaintiff objects to this request to the extent that it purports to request
9 information that is outside of the possession, custody or control of Plaintiff. Plaintiff objects to this
10 request as overly burdensome to the extent it purports to request documents that are, or should be,
11 within the possession custody and control of one or more of the Defendants. Plaintiff further
12 objects to this request as beyond the scope of the claims and defenses of the lawsuit between the
13 parties.

14 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
15 search, Plaintiff will produce responsive, non-privileged information within its custody and control
16 to the extent that such information exists.

17
18 **REQUEST NO. 21:**

19 Please produce all Documents Concerning Okada's responsibilities and duties, including any job
20 description, as director of Tiger Resorts Asia Limited.

21 **OBJECTIONS AND RESPONSE:**

22 Plaintiff incorporates each of its General Objections and Objections to Definitions and
23 Instructions as if fully set forth herein.

24 Plaintiff objects to this request to the extent it purports to request information that is neither
25 relevant to the subject matter of this lawsuit nor reasonably calculated to lead to the discovery of
26 admissible evidence. Plaintiff objects to this request to the extent it purports to request information
27 that is in the possession, custody or control of third parties to this lawsuit and not within the
28 possession, custody and control of Plaintiff. Plaintiff objects to this request to the extent it purports

1 to request information that is within the public domain and accordingly is at least as easily obtained
2 by the Defendants. Plaintiff objects to this request to the extent that it purports to request
3 information that is outside of the possession, custody or control of Plaintiff. Plaintiff objects to
4 this request as overly burdensome to the extent it purports to request documents that are, or should
5 be, within the possession custody and control of one or more of the Defendants. Plaintiff further
6 objects to this request as beyond the scope of the claims and defenses of the lawsuit between the
7 parties.

8 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
9 search, Plaintiff will produce responsive, non-privileged information within its custody and control
10 to the extent that such information exists.

11
12 **REQUEST NO. 22:**

13 Please produce all Documents Concerning UEC's revocation of Okada's appointment of nominee
14 director in Tiger Resorts Asia Limited.

15 **OBJECTIONS AND RESPONSE:**

16 Plaintiff incorporates each of its General Objections and Objections to Definitions and
17 Instructions as if fully set forth herein.

18 Plaintiff objects to this request to the extent it purports to request information that is neither
19 relevant to the subject matter of this lawsuit nor reasonably calculated to lead to the discovery of
20 admissible evidence. Plaintiff objects to this request to the extent it purports to request information
21 that is in the possession, custody or control of third parties to this lawsuit and not within the
22 possession, custody and control of Plaintiff. Plaintiff objects to this request to the extent it purports
23 to request information that is within the public domain and accordingly is at least as easily obtained
24 by the Defendants. Plaintiff objects to this request to the extent that it purports to request
25 information that is outside of the possession, custody or control of Plaintiff. Plaintiff objects to this
26 request as overly burdensome to the extent it purports to request documents that are, or should be,
27 within the possession custody and control of one or more of the Defendants. Plaintiff further
28 objects to this request as beyond the scope of the claims and defenses of the lawsuit between the

1 parties.

2 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
3 search, Plaintiff will produce responsive, non-privileged information within its custody and control
4 to the extent that such information exists.

5
6 **REQUEST NO. 23:**

7 Please produce the Agreement/Declaration of Trust between Tiger Resorts Asia Limited and Okada,
8 entrusting to Okada one (1) share of stock in Tiger Resorts Leisure and Entertainment, Inc.

9 **OBJECTIONS AND RESPONSE:**

10 Plaintiff incorporates each of its General Objections and Objections to Definitions and
11 Instructions as if fully set forth herein.

12 Plaintiff objects to this request to the extent it purports to request information that is neither
13 relevant to the subject matter of this lawsuit nor reasonably calculated to lead to the discovery of
14 admissible evidence. Plaintiff objects to this request to the extent it purports to request information
15 that is in the possession, custody or control of third parties to this lawsuit and not within the
16 possession, custody and control of Plaintiff. Plaintiff objects to this request to the extent it purports
17 to request information that is within the public domain and accordingly is at least as easily obtained
18 by the Defendants. Plaintiff objects to this request to the extent that it purports to request
19 information that is outside of the possession, custody or control of Plaintiff. Plaintiff objects to this
20 request as overly burdensome to the extent it purports to request documents that are, or should be,
21 within the possession custody and control of one or more of the Defendants. Plaintiff further
22 objects to this request as beyond the scope of the claims and defenses of the lawsuit between the
23 parties.

24 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
25 search, Plaintiff will produce responsive, non-privileged information within its custody and control
26 to the extent that such information exists.

27 //

28 //

REQUEST NO. 24:

Please produce the Tiger Resorts Asia Limited Resolution dated June 13, 2017, revoking the Agreement/Declaration of Trust between Tiger Resorts Asia Limited and Okada, entrusting to Okada one (1) share of stock in Tiger Resorts Leisure and Entertainment, Inc.

OBJECTIONS AND RESPONSE:

Plaintiff incorporates each of its General Objections and Objections to Definitions and Instructions as if fully set forth herein.

Plaintiff objects to this request to the extent it purports to request information that is neither relevant to the subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff objects to this request to the extent it purports to request information that is in the possession, custody or control of third parties to this lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff objects to this request to the extent it purports to request information that is within the public domain and accordingly is at least as easily obtained by the Defendants. Plaintiff objects to this request to the extent that it purports to request information that is outside of the possession, custody or control of Plaintiff. Plaintiff objects to this request as overly burdensome to the extent it purports to request documents that are, or should be, within the possession custody and control of one or more of the Defendants. Plaintiff further objects to this request as beyond the scope of the claims and defenses of the lawsuit between the parties.

Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and search, Plaintiff will produce responsive, non-privileged information within its custody and control to the extent that such information exists.

REQUEST NO. 25:

Please produce the Tiger Resorts Leisure and Entertainment, Inc. Resolution and Minutes of Shareholders' Meeting Implementing the Removal of Mr. Okada as a Director, in relation to the Documents requested in Requests No. 23 and 24.

//

OBJECTIONS AND RESPONSE:

Plaintiff incorporates each of its General Objections and Objections to Definitions and Instructions as if fully set forth herein.

Plaintiff objects to this request as vague and ambiguous in its use of the following terms, which are subject to more than one reasonable interpretation: "Director," as the request does not specify what Directorship it refers to. Plaintiff objects to this request to the extent it purports to request information that is neither relevant to the subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff objects to this request to the extent it purports to request information that is in the possession, custody or control of third parties to this lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff objects to this request to the extent it purports to request information that is within the public domain and accordingly is at least as easily obtained by the Defendants. Plaintiff objects to this request to the extent that it purports to request information that is outside of the possession, custody or control of Plaintiff. Plaintiff objects to this request as overly burdensome to the extent it purports to request documents that are, or should be, within the possession custody and control of one or more of the Defendants. Plaintiff further objects to this request as beyond the scope of the claims and defenses of the lawsuit between the parties.

Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and search, Plaintiff will produce responsive, non-privileged information within its custody and control to the extent that such information exists.

REQUEST NO. 26:

Please produce UEC's Former Affiliate Company Management Rules and current Subsidiary Company Rules (effective March 1, 2010).

OBJECTIONS AND RESPONSE:

Plaintiff incorporates each of its General Objections and Objections to Definitions and Instructions as if fully set forth herein.

Plaintiff objects to this request to the extent it purports to request information that is neither

relevant to the subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff objects to this request as overly burdensome to the extent it purports to request documents that are, or should be, within the possession custody and control of one or more of the Defendants.

Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and search, Plaintiff will produce responsive, non-privileged information within its custody and control to the extent that such information exists.

REQUEST NO. 27:

Please produce all Documents Concerning share transfers made by shareholders of Universal Sales Co., Ltd. from 1991-1994, including, without limitation, all stock ledgers of Universal Sales Co., Ltd.

OBJECTIONS AND RESPONSE:

Plaintiff incorporates each of its General Objections and Objections to Definitions and Instructions as if fully set forth herein.

Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it purports to request the production of "all" or "each and every" document in the requested category of documents. Such a request for all documents is unduly burdensome in particular given the extremely broad definitions of "Document" supplied by Defendants and, consequently, the request purports to require Plaintiff to collect documents from potentially every employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a reasonable list of custodians whose job responsibilities would indicate that they were in possession of potentially responsive information. Plaintiff objects to this request to the extent it purports to request information that is neither relevant to the subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff objects to this request to the extent that it is not reasonably limited to a time period relevant to the causes of action and claims at issue in this lawsuit.

Plaintiff objects to this request as overly burdensome to the extent it purports to request documents

1 that are, or should be, within the possession custody and control of one or more of the Defendants.
2 Plaintiff further objects to this request as beyond the scope of the claims and defenses of the lawsuit
3 between the parties.

4 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
5 search, Plaintiff will produce responsive, non-privileged information within its custody and control
6 to the extent that such information exists.

7
8 **REQUEST NO. 28:**

9 Please produce all Documents Concerning share transfers made by shareholders of UEC from 2009-
10 2011, including, without limitation, all stock ledgers of UEC.

11 **OBJECTIONS AND RESPONSE:**

12 Plaintiff incorporates each of its General Objections and Objections to Definitions and
13 Instructions as if fully set forth herein.

14 Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it
15 purports to request the production of "all" or "each and every" document in the requested category
16 of documents. Such a request for all documents is unduly burdensome in particular given the
17 extremely broad definitions of "Document" supplied by Defendants and, consequently, the request
18 purports to require Plaintiff to collect documents from potentially every employee, agent or attorney
19 of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a
20 reasonable list of custodians whose job responsibilities would indicate that they were in possession
21 of potentially responsive information. Plaintiff objects to this request to the extent it purports to
22 request information that is neither relevant to the subject matter of this lawsuit nor reasonably
23 calculated to lead to the discovery of admissible evidence. Plaintiff objects to this request as overly
24 burdensome to the extent it purports to request documents that are, or should be, within the
25 possession custody and control of one or more of the Defendants. Plaintiff further objects to this
26 request as beyond the scope of the claims and defenses of the lawsuit between the parties.

27 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
28 search, Plaintiff will produce responsive, non-privileged information within its custody and control

1 to the extent that such information exists.

2
3 **REQUEST NO. 29:**

4 Please produce all Documents Concerning share transfers made by shareholders of UEC in 2017,
5 including, without limitation, all stock ledgers of UEC.

6 **OBJECTIONS AND RESPONSE:**

7 Plaintiff incorporates each of its General Objections and Objections to Definitions and
8 Instructions as if fully set forth herein.

9 Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it
10 purports to request the production of “all” or “each and every” document in the requested category
11 of documents. Such a request for all documents is unduly burdensome in particular given the
12 extremely broad definitions of “Document” supplied by Defendants and, consequently, the request
13 purports to require Plaintiff to collect documents from potentially every employee, agent or attorney
14 of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a
15 reasonable list of custodians whose job responsibilities would indicate that they were in possession
16 of potentially responsive information. Plaintiff objects to this request to the extent it purports to
17 request information that is neither relevant to the subject matter of this lawsuit nor reasonably
18 calculated to lead to the discovery of admissible evidence. Plaintiff objects to this request as overly
19 burdensome to the extent it purports to request documents that are, or should be, within the
20 possession custody and control of one or more of the Defendants. Plaintiff further objects to this
21 request as beyond the scope of the claims and defenses of the lawsuit between the parties.

22 Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and
23 search, Plaintiff will produce responsive, non-privileged information within its custody and control
24 to the extent that such information exists.

25
26 *Patent*

27 **REQUEST NO. 30:**

28 Please produce all Documents Concerning all steps or efforts taken by UEC to enforce any of the

1 Asserted Patents against any person, including, but not limited to, charges of infringement of any of
2 the Asserted Patents.

3 **OBJECTIONS AND RESPONSE:**

4 Plaintiff incorporates each of its General Objections and Objections to Definitions and
5 Instructions as if fully set forth herein.

6 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
7 which are subject to more than one reasonable interpretation: “all Documents Concerning” “all
8 steps or efforts” “charges of infringement”. Plaintiff will undertake to interpret these terms as they
9 would in ordinary usage given the context. Plaintiff objects to this request as overly broad and
10 unduly burdensome inasmuch as it purports to request the production of “all” or “each and every”
11 document in the requested category of documents. Such a request for all documents is unduly
12 burdensome in particular given the extremely broad definitions of “Document” supplied by
13 Defendants and, consequently, the request purports to require Plaintiff to collect documents from
14 potentially every employee, agent or attorney of Plaintiff rather than conduct a reasonable
15 investigation that collects responsive documents from a reasonable list of custodians whose job
16 responsibilities would indicate that they were in possession of potentially responsive
17 information. Plaintiff objects to this request to the extent it purports to request the production of
18 information subject to the attorney-client privilege, the work product doctrine or any other
19 recognized privilege or immunity. Plaintiff objects to this request to the extent it purports to
20 request information that is neither relevant to the subject matter of this lawsuit nor reasonably
21 calculated to lead to the discovery of admissible evidence. Plaintiff objects to this request to the
22 extent that it is not reasonably limited to a time period relevant to the causes of action and claims at
23 issue in this lawsuit. Plaintiff further objects to this request as beyond the scope of the claims and
24 defenses of the lawsuit between the parties.

25 Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and
26 search, Plaintiff will produce responsive, non-privileged information within its custody and control
27 to the extent that such information exists.

28 //

REQUEST NO. 31:

Please produce all Documents in support of paragraph 69 of the Second Amended Complaint, which states “Because of Okada’s actual knowledge of the Asserted Patents, AGA also had actual knowledge of the Asserted Patents.”

OBJECTIONS AND RESPONSE:

Plaintiff incorporates each of its General Objections and Objections to Definitions and Instructions as if fully set forth herein.

Plaintiff objects to this request to the extent it purports to request information that is within the public domain and accordingly is at least as easily obtained by the Defendants. Plaintiff objects to this request to the extent that it purports to request information that is outside of the possession, custody or control of Plaintiff. Plaintiff objects to this request as overly burdensome to the extent it purports to request documents that are, or should be, within the possession custody and control of one or more of the Defendants.

Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and search, Plaintiff will produce responsive, non-privileged information within its custody and control to the extent that such information exists.

REQUEST NO. 32:

Please produce all Documents in support of paragraph 70 of the Second Amended Complaint, which states “Upon information and belief, Okada directed employees of AGA located in Nevada to develop and produce the Accused Products, which made use of the technology claimed in the Asserted Patents, without obtaining a license or permission from UEC, and thereby infringing the Asserted Patents.”

OBJECTIONS AND RESPONSE:

Plaintiff incorporates each of its General Objections and Objections to Definitions and Instructions as if fully set forth herein.

Plaintiff objects to this request to the extent it purports to request information that is within the public domain and accordingly is at least as easily obtained by the Defendants.

1 Plaintiff objects to this request to the extent that it purports to request information that is outside of
2 the possession, custody or control of Plaintiff. Plaintiff objects to this request as overly burdensome
3 to the extent it purports to request documents that are, or should be, within the possession custody
4 and control of one or more of the Defendants.

5 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
6 search, Plaintiff will produce responsive, non-privileged information within its custody and control
7 to the extent that such information exists.

8
9 **REQUEST NO. 33:**

10 Please produce all Documents in support of paragraph 71 of the Second Amended Complaint,
11 which states, "AGA provided no benefit or compensation to UEC for its exploitation of the
12 Asserted Patents; AGA never entered into a license agreement with UEC."

13 **OBJECTIONS AND RESPONSE:**

14 Plaintiff incorporates each of its General Objections and Objections to Definitions and
15 Instructions as if fully set forth herein.

16 Plaintiff objects to this request to the extent it purports to request information that is within
17 the public domain and accordingly is at least as easily obtained by the Defendants. Plaintiff objects
18 to this request to the extent that it purports to request information that is outside of the possession,
19 custody or control of Plaintiff. Plaintiff objects to this request as overly burdensome to the extent it
20 purports to request documents that are, or should be, within the possession custody and control of
21 one or more of the Defendants.

22 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
23 search, Plaintiff will produce responsive, non-privileged information within its custody and control
24 to the extent that such information exists.

25
26 **REQUEST NO. 34:**

27 Please produce all Documents in support of paragraph 72 of the Second Amended Complaint,
28 which states "UEC did not learn of AGA's unauthorized use of UEC's patent rights, including the

1 Asserted Patents, until UEC began investigating Okada's misconduct in 2017."

2 **OBJECTIONS AND RESPONSE:**

3 Plaintiff incorporates each of its General Objections and Objections to Definitions and
4 Instructions as if fully set forth herein.

5 Plaintiff objects to this request to the extent it purports to request the production of
6 information subject to the attorney-client privilege, the work product doctrine or any other
7 recognized privilege or immunity. Plaintiff objects to this request to the extent that it purports to
8 request information that is outside of the possession, custody or control of Plaintiff. Plaintiff
9 objects to this request as overly burdensome to the extent it purports to request documents that are,
10 or should be, within the possession custody and control of one or more of the Defendants.

11 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
12 search, Plaintiff will produce responsive, non-privileged information within its custody and control
13 to the extent that such information exists.

14
15 **REQUEST NO. 35:**

16 Please produce all Documents Concerning the preparation, filing, and prosecution of each Asserted
17 Patent, Related Patent, and Related Application, including, without limitation, all draft and final
18 versions of the invention disclosure, the application(s), a copy of the prosecution history, draft
19 versions of the application(s), draft versions of responses to office actions, and all communications
20 regarding the preparation, filing, prosecution, abandonment, and revival of such patent applications.

21 **OBJECTIONS AND RESPONSE:**

22 Plaintiff incorporates each of its General Objections and Objections to Definitions and
23 Instructions as if fully set forth herein.

24 Plaintiff objects to this request to the extent it purports to request the production of
25 information subject to the attorney-client privilege, the work product doctrine or any other
26 recognized privilege or immunity. Plaintiff objects to this request to the extent it purports to request
27 information that is within the public domain and accordingly is at least as easily obtained by the
28 Defendants from the PAIR database of the USPTO.

1 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
2 search, Plaintiff will produce responsive, non-privileged information within its custody and control
3 to the extent that such information exists.

4
5 **REQUEST NO. 36:**

6 Please produce all Documents Concerning UEC's contention that AGA has willfully infringed any
7 Asserted Claim.

8 **OBJECTIONS AND RESPONSE:**

9 Plaintiff incorporates each of its General Objections and Objections to Definitions and
10 Instructions as if fully set forth herein.

11 Plaintiff objects to this request to the extent it purports to request the production of
12 information subject to the attorney-client privilege, the work product doctrine or any other
13 recognized privilege or immunity. Plaintiff objects to this request to the extent that it purports to
14 request information that is outside of the possession, custody or control of Plaintiff. Plaintiff
15 objects to this request as overly burdensome to the extent it purports to request documents that are,
16 or should be, within the possession custody and control of one or more of the Defendants.

17 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
18 search, Plaintiff will produce responsive, non-privileged information within its custody and control
19 to the extent that such information exists.

20
21 **REQUEST NO. 37:**

22 Please produce all Documents Concerning UEC's contention that AGA has induced the
23 infringement of any Asserted Claim.

24 **OBJECTIONS AND RESPONSE:**

25 Plaintiff incorporates each of its General Objections and Objections to Definitions and
26 Instructions as if fully set forth herein.

27 Plaintiff objects to this request to the extent it purports to request the production of
28 information subject to the attorney-client privilege, the work product doctrine or any other

1 recognized privilege or immunity. Plaintiff objects to this request to the extent that it purports to
2 request information that is outside of the possession, custody or control of Plaintiff. Plaintiff
3 objects to this request as overly burdensome to the extent it purports to request documents that are,
4 or should be, within the possession custody and control of one or more of the Defendants.

5 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
6 search, Plaintiff will produce responsive, non-privileged information within its custody and control
7 to the extent that such information exists.

8
9 **REQUEST NO. 38:**

10 Please produce all Documents Concerning UEC's contention that AGA has contributorily infringed
11 any Asserted Claim.

12 **OBJECTIONS AND RESPONSE:**

13 Plaintiff incorporates each of its General Objections and Objections to Definitions and
14 Instructions as if fully set forth herein.

15 Plaintiff objects to this request to the extent it purports to request the production of
16 information subject to the attorney-client privilege, the work product doctrine or any other
17 recognized privilege or immunity. Plaintiff objects to this request to the extent that it purports to
18 request information that is outside of the possession, custody or control of Plaintiff. Plaintiff
19 objects to this request as overly burdensome to the extent it purports to request documents that are,
20 or should be, within the possession custody and control of one or more of the Defendants.

21 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
22 search, Plaintiff will produce responsive, non-privileged information within its custody and control
23 to the extent that such information exists.

24
25 **REQUEST NO. 39:**

26 Please produce all Documents Concerning any UEC policy or procedure for acquisitions, mergers,
27 or asset purchases, including Documents explaining or identifying any due diligence procedure, any
28 investigation procedure, any intellectual property valuation procedure, and any technology transfer

1 procedure since January 1, 2007.

2 **OBJECTIONS AND RESPONSE:**

3 Plaintiff incorporates each of its General Objections and Objections to Definitions and
4 Instructions as if fully set forth herein.

5 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
6 which are subject to more than one reasonable interpretation: “all Documents Concerning” “any
7 UEC policy” “Documents explaining”. Plaintiff will undertake to interpret these terms as they
8 would in ordinary usage given the context. Plaintiff objects to this request as overly broad and
9 unduly burdensome inasmuch as it purports to request the production of “all” or “each and every”
10 document in the requested category of documents. Such a request for all documents is unduly
11 burdensome in particular given the extremely broad definitions of “Document” supplied by
12 Defendants and, consequently, the request purports to require Plaintiff to collect documents from
13 potentially every employee, agent or attorney of Plaintiff rather than conduct a reasonable
14 investigation that collects responsive documents from a reasonable list of custodians whose job
15 responsibilities would indicate that they were in possession of potentially responsive
16 information. Plaintiff objects to this request to the extent it purports to request the production of
17 information subject to the attorney-client privilege, the work product doctrine or any other
18 recognized privilege or immunity. Plaintiff objects to this request to the extent it purports to
19 request information that is neither relevant to the subject matter of this lawsuit nor reasonably
20 calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request as
21 beyond the scope of the claims and defenses of the lawsuit between the parties.

22 Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and
23 search, Plaintiff will produce responsive, non-privileged information within its custody and control
24 to the extent that such information exists.

25
26 **REQUEST NO. 40:**

27 Please produce all Documents Concerning any technical or industry conference, symposium, trade
28 show, standards committee(s), or meeting concerning the subject matter of any of the Asserted

1 Patents attended by any of the Named Inventors anywhere in the world before the filing of the
2 corresponding Related Applications, including but not limited to all Documents showing the
3 attendance by any of the Named Inventors, notes by any of the Named Inventors, and Documents
4 received at the conference, symposium, trade show, standards committee(s) or meeting since
5 December 1, 1997 as to Mr. Sekine, and January 1, 2017 as to all other Named Inventors.

6 **OBJECTIONS AND RESPONSE:**

7 Plaintiff incorporates each of its General Objections and Objections to Definitions and
8 Instructions as if fully set forth herein.

9 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
10 which are subject to more than one reasonable interpretation: “All Documents
11 Concerning”. Plaintiff will undertake to interpret these terms as they would in ordinary usage given
12 the context. Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it
13 purports to request the production of “all” or “each and every” document in the requested category
14 of documents. Such a request for all documents is unduly burdensome in particular given the
15 extremely broad definitions of “Document” supplied by Defendants and, consequently, the request
16 purports to require Plaintiff to collect documents from potentially every employee, agent or attorney
17 of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a
18 reasonable list of custodians whose job responsibilities would indicate that they were in possession
19 of potentially responsive information. Plaintiff objects to this request to the extent it purports to
20 request information that is neither relevant to the subject matter of this lawsuit nor reasonably
21 calculated to lead to the discovery of admissible evidence.

22 Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and
23 search, Plaintiff will produce responsive, non-privileged information within its custody and control
24 to the extent that such information exists.

25
26 **REQUEST NO. 41:**

27 Please produce all Documents Concerning, or on which UEC intends to rely in support of, UEC’s
28 contention that any of the Asserted Patents are valid.

OBJECTIONS AND RESPONSE:

Plaintiff incorporates each of its General Objections and Objections to Definitions and Instructions as if fully set forth herein.

Plaintiff objects to this request as vague and ambiguous in its use of the following terms, which are subject to more than one reasonable interpretation: “all Documents Concerning” and “intends to rely in support of.” Plaintiff will undertake to interpret these terms as they would in ordinary usage given the context. Plaintiff objects to this request to the extent it purports to request the production of information subject to the attorney-client privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff further objects to this request as premature inasmuch as discovery in this case has just begun and the Plaintiff has not yet completed its investigation of the relevant facts, the Court has not rendered any rulings or claim constructions and the parties have not completed expert discovery.

Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and search, Plaintiff will produce responsive, non-privileged information within its custody and control to the extent that such information exists.

REQUEST NO. 42:

Please produce all Documents Concerning any alleged secondary indicia of non-obviousness, including without limitation:

- (a) any long-felt need for the alleged inventions claimed or technology disclosed in any of the Asserted Patents;
- (b) any failure in the relevant art to solve the problems that are the subjects of the alleged inventions claimed or technology disclosed in any of the Asserted Patents;
- (c) any commercial success of the alleged inventions claimed or technology disclosed in any of the Asserted Patents;
- (d) any industry recognition or praise of the alleged inventions claimed or technology disclosed in any of the Asserted Patents;

- 1 (e) any copying or adoption by others of the alleged inventions claimed or technology
- 2 disclosed in any of the Asserted Patents;
- 3 (f) any skepticism towards the alleged inventions claimed or technology disclosed in any
- 4 of the Asserted Patents;
- 5 (g) any commercial acquiescence of competitors to license the alleged inventions claimed
- 6 or technology disclosed in any of the Asserted Patents;
- 7 (h) any failure of others to independently develop the alleged inventions claimed or
- 8 technology disclosed in any of the Asserted Patents;
- 9 (i) any prior litigation regarding the alleged inventions claimed or technology disclosed
- 10 in any of the Asserted Patents; or
- 11 (j) any surprise towards the capabilities of the alleged inventions claimed or the
- 12 technology disclosed in any of the Asserted Patents.

13 **OBJECTIONS AND RESPONSE:**

14 Plaintiff incorporates each of its General Objections and Objections to Definitions and
15 Instructions as if fully set forth herein.

16 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
17 which are subject to more than one reasonable interpretation: “secondary indicia of non-
18 obviousness, “commercial success” “skepticism” “commercial acquiescence” “failure of others to
19 independently develop” “surprise towards the capabilities.” Plaintiff will undertake to interpret
20 these terms as they would in ordinary usage given the context. Plaintiff objects to this request as
21 overly broad and unduly burdensome inasmuch as it purports to request the production of “all” or
22 “each and every” document in the requested category of documents. Such a request for all
23 documents is unduly burdensome in particular given the extremely broad definitions of “Document”
24 supplied by Defendants and, consequently, the request purports to require Plaintiff to collect
25 documents from potentially every employee, agent or attorney of Plaintiff rather than conduct a
26 reasonable investigation that collects responsive documents from a reasonable list of custodians
27 whose job responsibilities would indicate that they were in possession of potentially responsive
28 information. Plaintiff further objects to this request as overly broad and unduly burdensome to the

1 extent it is compound. Plaintiff further objects to this request as overly broad and unduly
2 burdensome to the extent it is open ended (“including without limitation”), which requires the
3 Plaintiff to guess as to what information beyond the numerous categories of information that
4 Defendants actually seek. Plaintiff objects to this request to the extent it purports to request the
5 production of information subject to the attorney-client privilege, the work product doctrine or any
6 other recognized privilege or immunity. Plaintiff objects to this request to the extent it purports to
7 request information that is neither relevant to the subject matter of this lawsuit nor reasonably
8 calculated to lead to the discovery of admissible evidence. Plaintiff objects to this request to the
9 extent it purports to request information that is in the possession, custody or control of third parties
10 to this lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff objects to
11 this request to the extent it purports to request information that is within the public domain and
12 accordingly is at least as easily obtained by the Defendants. Plaintiff objects to this request as
13 overly burdensome to the extent it purports to request documents that are, or should be, within the
14 possession custody and control of one or more of the Defendants. Plaintiff objects to this request
15 as overly burdensome to the extent it purports to duplicate or overlap in subject matter with other
16 requests propounded by the Defendants.

17 Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and
18 search, Plaintiff will produce responsive, non-privileged information within its custody and control
19 to the extent that such information exists.

20
21 **REQUEST NO. 43:**

22 Please produce all publications authored or co-authored by any of the Named Inventors, which pre-
23 date the filing date of any of the Asserted Patents on which such a Named Inventor is so named.

24 **OBJECTIONS AND RESPONSE:**

25 Plaintiff incorporates each of its General Objections and Objections to Definitions and
26 Instructions as if fully set forth herein.

27 Plaintiff objects to this request to the extent it purports to request information that is neither
28 relevant to the subject matter of this lawsuit nor reasonably calculated to lead to the discovery of

admissible evidence. Plaintiff objects to this request to the extent it purports to request information that is in the possession, custody or control of third parties to this lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff objects to this request to the extent it purports to request information that is within the public domain and accordingly is at least as easily obtained by the Defendants. Plaintiff objects to this request to the extent that it purports to request information that is outside of the possession, custody or control of Plaintiff. Plaintiff objects to this request as overly burdensome to the extent it purports to request documents that are, or should be, within the possession custody and control of one or more of the Defendants.

Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and search, Plaintiff will produce responsive, non-privileged information within its custody and control to the extent that such information exists.

REQUEST NO. 44:

Please produce all Documents Concerning all Prior Art known to UEC, any Named Inventor, and/or Patent Counsel that pertains to the subject matter claimed in any of the Asserted Patents, whether or not cited to the U.S. Patent and Trademark Office.

OBJECTIONS AND RESPONSE:

Plaintiff incorporates each of its General Objections and Objections to Definitions and Instructions as if fully set forth herein.

Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it purports to request the production of "all" or "each and every" document in the requested category of documents. Such a request for all documents is unduly burdensome in particular given the extremely broad definitions of "Document" supplied by Defendants and, consequently, the request purports to require Plaintiff to collect documents from potentially every employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a reasonable list of custodians whose job responsibilities would indicate that they were in possession of potentially responsive information. Plaintiff objects to this request to the extent it purports to request information that is neither relevant to the subject matter of this lawsuit nor reasonably

1 calculated to lead to the discovery of admissible evidence. Plaintiff objects to this request to the
2 extent it purports to request the production of information subject to the attorney-client privilege,
3 the work product doctrine or any other recognized privilege or immunity. Plaintiff objects to this
4 request to the extent it purports to request information that is in the possession, custody or control of
5 third parties to this lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff
6 objects to this request to the extent it purports to request information that is within the public
7 domain and accordingly is at least as easily obtained by the Defendants. Plaintiff objects to this
8 request to the extent that it purports to request information that is outside of the possession, custody
9 or control of Plaintiff. Plaintiff objects to this request as overly burdensome to the extent it purports
10 to request documents that are, or should be, within the possession custody and control of one or
11 more of the Defendants.

12 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
13 search, Plaintiff will produce responsive, non-privileged information within its custody and control
14 to the extent that such information exists.

15
16 **REQUEST NO. 45:**

17 Please produce all employment or consulting agreements between UEC or others (including
18 predecessor and UEC-acquired entities) and any of the Named Inventors.

19 **OBJECTIONS AND RESPONSE:**

20 Plaintiff incorporates each of its General Objections and Objections to Definitions and
21 Instructions as if fully set forth herein.

22 Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it
23 purports to request the production of "all" or "each and every" document in the requested category
24 of documents. Such a request for all documents is unduly burdensome in particular given the
25 extremely broad definitions of "Document" supplied by Defendants and, consequently, the request
26 purports to require Plaintiff to collect documents from potentially every employee, agent or attorney
27 of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a
28 reasonable list of custodians whose job responsibilities would indicate that they were in possession

1 of potentially responsive information. Plaintiff objects to this request to the extent it purports to
2 request information that is neither relevant to the subject matter of this lawsuit nor reasonably
3 calculated to lead to the discovery of admissible evidence. Plaintiff objects to this request to the
4 extent that it is not reasonably limited to a time period relevant to the causes of action and claims at
5 issue in this lawsuit. Plaintiff objects to this request as overly burdensome to the extent it purports
6 to duplicate or overlap in subject matter with other requests propounded by the Defendants.
7 Plaintiff further objects to this request as beyond the scope of the claims and defenses of the lawsuit
8 between the parties.

9 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
10 search, Plaintiff will produce responsive, non-privileged information within its custody and control
11 to the extent that such information exists.

12
13 **REQUEST NO. 46:**

14 Please produce all opinions of counsel Concerning the validity, enforceability, infringement, or non-
15 infringement of any of the Asserted Patents.

16 **OBJECTIONS AND RESPONSE:**

17 Plaintiff incorporates each of its General Objections and Objections to Definitions and
18 Instructions as if fully set forth herein.

19 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
20 which are subject to more than one reasonable interpretation: "all opinions of counsel Concerning."
21 Plaintiff will undertake to interpret these terms as they would in ordinary usage given the
22 context. Plaintiff objects to this request to the extent it purports to request the production of
23 information subject to the attorney-client privilege, the work product doctrine or any other
24 recognized privilege or immunity. Plaintiff notes that this request expressly requests information
25 covered by both the attorney-client privilege and work product doctrine. Plaintiff further objects to
26 this request as premature inasmuch as discovery in this case has just begun and the Plaintiff has not
27 yet completed its investigation of the relevant facts, the Court has not rendered any rulings or claim
28 constructions and the parties have not completed expert discovery.

1 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
2 search, Plaintiff will produce responsive, non-privileged information within its custody and control
3 to the extent that such information exists.

4
5 **REQUEST NO. 47:**

6 Please produce all affidavits, trial or deposition testimony, exhibits for such testimony, declarations,
7 or other sworn statements of which UEC is aware Concerning any of the Asserted Patents and/or
8 the inventions claimed in any of any Asserted Patents.

9 **OBJECTIONS AND RESPONSE:**

10 Plaintiff incorporates each of its General Objections and Objections to Definitions and
11 Instructions as if fully set forth herein.

12 Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it
13 purports to request the production of "all" or "each and every" document in the requested category
14 of documents. Such a request for all documents is unduly burdensome in particular given the
15 extremely broad definitions of "Document" supplied by Defendants and, consequently, the request
16 purports to require Plaintiff to collect documents from potentially every employee, agent or attorney
17 of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a
18 reasonable list of custodians whose job responsibilities would indicate that they were in possession
19 of potentially responsive information. Plaintiff objects to this request to the extent it purports to
20 request information that is neither relevant to the subject matter of this lawsuit nor reasonably
21 calculated to lead to the discovery of admissible evidence. Plaintiff objects to this request to the
22 extent it purports to request information that is in the possession, custody or control of third parties
23 to this lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff objects to
24 this request to the extent that it purports to request information that is outside of the possession,
25 custody or control of Plaintiff. Plaintiff objects to this request as overly burdensome to the extent it
26 purports to request documents that are, or should be, within the possession custody and control of
27 one or more of the Defendants. Plaintiff objects to this request as overly burdensome to the extent
28 it purports to duplicate or overlap in subject matter with other requests propounded by the

1 Defendants.

2 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
3 search, Plaintiff will produce responsive, non-privileged information within its custody and control
4 to the extent that such information exists.

5
6 **REQUEST NO. 48:**

7 Please produce all UEC and any UEC-acquired entity board and executive notes, minutes, agendas,
8 or memoranda making any reference to any of the Asserted Patents, this litigation, or AGA.

9 **OBJECTIONS AND RESPONSE:**

10 Plaintiff incorporates each of its General Objections and Objections to Definitions and
11 Instructions as if fully set forth herein.

12 Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it
13 purports to request the production of "all" or "each and every" document in the requested category
14 of documents. Such a request for all documents is unduly burdensome in particular given the
15 extremely broad definitions of "Document" supplied by Defendants and, consequently, the request
16 purports to require Plaintiff to collect documents from potentially every employee, agent or attorney
17 of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a
18 reasonable list of custodians whose job responsibilities would indicate that they were in possession
19 of potentially responsive information. Plaintiff objects to this request to the extent it purports to
20 request the production of information subject to the attorney-client privilege, the work product
21 doctrine or any other recognized privilege or immunity. Plaintiff objects to this request to the
22 extent it purports to request information that is neither relevant to the subject matter of this lawsuit
23 nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff objects to this
24 request as overly burdensome to the extent it purports to request documents that are, or should be,
25 within the possession custody and control of one or more of the Defendants. Plaintiff further
26 objects to this request as premature inasmuch as discovery in this case has just begun and the
27 Plaintiff has not yet completed its investigation of the relevant facts, the Court has not rendered any
28 rulings or claim constructions and the parties have not completed expert discovery.

1 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
 2 search, Plaintiff will produce responsive, non-privileged information within its custody and control
 3 to the extent that such information exists.

4
 5 **REQUEST NO. 49:**

6 Please produce all Documents Concerning any of the Asserted Patents and any of the Related
 7 Applications that matured into any of the Asserted Patents, including but not limited to Documents
 8 Concerning the references cited in any of the Asserted Patents and communications with third
 9 parties about any of the Asserted Patents.

10 **OBJECTIONS AND RESPONSE:**

11 Plaintiff incorporates each of its General Objections and Objections to Definitions and
 12 Instructions as if fully set forth herein.

13 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
 14 which are subject to more than one reasonable interpretation: "all Documents
 15 Concerning." Plaintiff will undertake to interpret these terms as they would in ordinary usage given
 16 the context. Plaintiff further objects to this request as vague and ambiguous to the extent it is
 17 compound. Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it
 18 purports to request the production of "all" or "each and every" document in the requested category
 19 of documents. Such a request for all documents is unduly burdensome in particular given the
 20 extremely broad definitions of "Document" supplied by Defendants and, consequently, the request
 21 purports to require Plaintiff to collect documents from potentially every employee, agent or attorney
 22 of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a
 23 reasonable list of custodians whose job responsibilities would indicate that they were in possession
 24 of potentially responsive information. Plaintiff objects to this request to the extent it purports to
 25 request the production of information subject to the attorney-client privilege, the work product
 26 doctrine or any other recognized privilege or immunity. Plaintiff objects to this request to the extent
 27 it purports to request information that is in the possession, custody or control of third parties to this
 28 lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff objects to this

1 request to the extent it purports to request information that is within the public domain and
2 accordingly is at least as easily obtained by the Defendants. Plaintiff objects to this request to the
3 extent that it purports to request information that is outside of the possession, custody or control of
4 Plaintiff. Plaintiff objects to this request as overly burdensome to the extent it purports to request
5 documents that are, or should be, within the possession custody and control of one or more of the
6 Defendants. Plaintiff objects to this request as overly burdensome to the extent it purports to
7 duplicate or overlap in subject matter with other requests propounded by the Defendants.

8 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
9 search, Plaintiff will produce responsive, non-privileged information within its custody and control
10 to the extent that such information exists.

11
12 **REQUEST NO. 50:**

13 Please produce all Documents Concerning the best mode of carrying out the subject matter
14 disclosed or claimed in any of the Asserted Patents known to any of the Named Inventors at any
15 time prior to the filing of any of the Related Applications.

16 **OBJECTIONS AND RESPONSE:**

17 Plaintiff incorporates each of its General Objections and Objections to Definitions and
18 Instructions as if fully set forth herein.

19 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
20 which are subject to more than one reasonable interpretation: "best mode". Plaintiff will undertake
21 to interpret these terms as they would in ordinary usage given the context. Plaintiff objects to this
22 request to the extent it purports to request information that is neither relevant to the subject matter
23 of this lawsuit nor reasonably calculated to lead to the discovery of admissible evidence. The "best
24 mode" requirement of patents in the United States is not a basis for invalidating any patent claim.
25 Plaintiff objects to this request to the extent that it is not reasonably limited to a time period relevant
26 to the causes of action and claims at issue in this lawsuit.

27 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
28 search, Plaintiff will produce responsive, non-privileged information within its custody and control

1 to the extent that such information exists.

2
3 **REQUEST NO. 51:**

4 Please produce all Documents Concerning any experimentation or analysis of the subject matter of
5 the claims of any Asserted Patent conducted by or for UEC or by any third party prior to each filing
6 date of each of the Asserted Patents.

7 **OBJECTIONS AND RESPONSE:**

8 Plaintiff incorporates each of its General Objections and Objections to Definitions and
9 Instructions as if fully set forth herein.

10 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
11 which are subject to more than one reasonable interpretation: “Documents Concerning” and “any
12 experimentation or analysis of the subject matter.” Plaintiff will undertake to interpret these terms
13 as they would in ordinary usage given the context. Plaintiff objects to this request to the extent it
14 purports to request information that is neither relevant to the subject matter of this lawsuit nor
15 reasonably calculated to lead to the discovery of admissible evidence. Plaintiff objects to this
16 request to the extent that it is not reasonably limited to a time period relevant to the causes of action
17 and claims at issue in this lawsuit.

18 Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and
19 search, Plaintiff will produce responsive, non-privileged information within its custody and control
20 to the extent that such information exists.

21
22 **REQUEST NO. 52:**

23 Please produce all Patents, Related Applications, Related Patents, patent file histories, and
24 Documents or files Concerning all patents on which any of the Named Inventors is a named
25 inventor. This request is limited to Documents created prior to the issue date of the Asserted Patent
26 on which a named Inventor is so named.

27 **OBJECTIONS AND RESPONSE:**

28 Plaintiff incorporates each of its General Objections and Objections to Definitions and

1 Instructions as if fully set forth herein.

2 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
3 which are subject to more than one reasonable interpretation: “patent file histories” and “files
4 Concerning.” Plaintiff objects to this request to the extent it purports to request information that is
5 neither relevant to the subject matter of this lawsuit nor reasonably calculated to lead to the
6 discovery of admissible evidence. Plaintiff objects to this request to the extent that it is not
7 reasonably limited to a time period relevant to the causes of action and claims at issue in this
8 lawsuit. Plaintiff further objects to this request as beyond the scope of the claims and defenses of
9 the lawsuit between the parties. Plaintiff objects to this request to the extent that it purports to
10 request information that is outside of the possession, custody or control of Plaintiff. Plaintiff
11 objects to this request as overly burdensome to the extent it purports to request documents that are,
12 or should be, within the possession custody and control of one or more of the Defendants. Plaintiff
13 objects to this request as overly burdensome to the extent it purports to duplicate or overlap in
14 subject matter with other requests propounded by the Defendants. Plaintiff objects to this request to
15 the extent it purports to request information that is within the public domain and accordingly is at
16 least as easily obtained by the Defendants.

17 Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and
18 search, Plaintiff will produce responsive, non-privileged information within its custody and control
19 to the extent that such information exists.

20
21 **REQUEST NO. 53:**

22 Please produce, for each Named Inventor, Documents sufficient to show the background, education,
23 and work history of such person.

24 **OBJECTIONS AND RESPONSE:**

25 Plaintiff incorporates each of its General Objections and Objections to Definitions and
26 Instructions as if fully set forth herein.

27 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
28 which are subject to more than one reasonable interpretation: “background.” Plaintiff objects to

1 this request as overly broad and unduly burdensome inasmuch as it purports to request the
2 production of “all” or “each and every” document in the requested category of documents. Such a
3 request for all documents is unduly burdensome in particular given the extremely broad definitions
4 of “Document” supplied by Defendants and, consequently, the request purports to require Plaintiff
5 to collect documents from potentially every employee, agent or attorney of Plaintiff rather than
6 conduct a reasonable investigation that collects responsive documents from a reasonable list of
7 custodians whose job responsibilities would indicate that they were in possession of potentially
8 responsive information. Plaintiff objects to this request to the extent it purports to request
9 information that is neither relevant to the subject matter of this lawsuit nor reasonably calculated to
10 lead to the discovery of admissible evidence. Plaintiff objects to this request to the extent it
11 purports to request information that is in the possession, custody or control of third parties to this
12 lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff objects to this
13 request to the extent that it is not reasonably limited to a time period relevant to the causes of action
14 and claims at issue in this lawsuit. Plaintiff objects to this request to the extent that it purports to
15 request information that is outside of the possession, custody or control of Plaintiff. Plaintiff
16 further objects to this request as beyond the scope of the claims and defenses of the lawsuit between
17 the parties.

18 Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and
19 search, Plaintiff will produce responsive, non-privileged information within its custody and control
20 to the extent that such information exists.

21
22 **REQUEST NO. 54:**

23 Please produce all Documents Concerning tracking of time worked and tasks performed on the G-
24 ENEX project for all UEC employees and all AGA employees during the time AGA was affiliated
25 with UEC.

26 **OBJECTIONS AND RESPONSE:**

27 Plaintiff incorporates each of its General Objections and Objections to Definitions and
28 Instructions as if fully set forth herein.

1 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
2 which are subject to more than one reasonable interpretation: “all Documents Concerning,”
3 “tracking of time worked” and “tasks performed.” Plaintiff objects to this request as overly broad
4 and unduly burdensome inasmuch as it purports to request the production of “all” or “each and
5 every” document in the requested category of documents. Such a request for all documents is
6 unduly burdensome in particular given the extremely broad definitions of “Document” supplied by
7 Defendants and, consequently, the request purports to require Plaintiff to collect documents from
8 potentially every employee, agent or attorney of Plaintiff rather than conduct a reasonable
9 investigation that collects responsive documents from a reasonable list of custodians whose job
10 responsibilities would indicate that they were in possession of potentially responsive
11 information. Plaintiff objects to this request to the extent it purports to request information that is
12 neither relevant to the subject matter of this lawsuit nor reasonably calculated to lead to the
13 discovery of admissible evidence.

14 Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and
15 search, Plaintiff will produce responsive, non-privileged information within its custody and control
16 to the extent that such information exists.

17
18 **REQUEST NO. 55:**

19 Please produce all employee records for Named Inventor Mr. Koichiro Hashimoto.

20 **OBJECTIONS AND RESPONSE:**

21 Plaintiff incorporates each of its General Objections and Objections to Definitions and
22 Instructions as if fully set forth herein.

23 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
24 which are subject to more than one reasonable interpretation: “employee records.” Plaintiff objects
25 to this request as overly broad and unduly burdensome inasmuch as it purports to request the
26 production of “all” or “each and every” document in the requested category of documents. Such a
27 request for all documents is unduly burdensome in particular given the extremely broad definitions
28 of “Document” supplied by Defendants and, consequently, the request purports to require Plaintiff

1 to collect documents from potentially every employee, agent or attorney of Plaintiff rather than
2 conduct a reasonable investigation that collects responsive documents from a reasonable list of
3 custodians whose job responsibilities would indicate that they were in possession of potentially
4 responsive information. Plaintiff objects to this request to the extent it purports to request
5 information that is neither relevant to the subject matter of this lawsuit nor reasonably calculated to
6 lead to the discovery of admissible evidence. Plaintiff objects to this request to the extent it
7 purports to request information that is in the possession, custody or control of third parties to this
8 lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff objects to this
9 request to the extent that it purports to request information that is outside of the possession, custody
10 or control of Plaintiff. Plaintiff objects to this request as overly burdensome to the extent it purports
11 to duplicate or overlap in subject matter with other requests propounded by the Defendants.

12 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
13 search, Plaintiff will produce responsive, non-privileged information within its custody and control
14 to the extent that such information exists.

15
16 **REQUEST NO. 56:**

17 Please produce all Documents Concerning product presentations made by AGA from April 1,
18 2007 to present, including but not limited to, photos, video recordings, and notes made by UEC
19 employees in attendance at AGA product presentations.

20 **OBJECTIONS AND RESPONSE:**

21 Plaintiff incorporates each of its General Objections and Objections to Definitions and
22 Instructions as if fully set forth herein.

23 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
24 which are subject to more than one reasonable interpretation: "Documents Concerning" and
25 "product presentations." Plaintiff objects to this request as overly broad and unduly burdensome
26 inasmuch as it purports to request the production of "all" or "each and every" document in the
27 requested category of documents. Such a request for all documents is unduly burdensome in
28 particular given the extremely broad definitions of "Document" supplied by Defendants and,

1 consequently, the request purports to require Plaintiff to collect documents from potentially every
2 employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects
3 responsive documents from a reasonable list of custodians whose job responsibilities would indicate
4 that they were in possession of potentially responsive information. Plaintiff objects to this request
5 to the extent it purports to request information that is neither relevant to the subject matter of this
6 lawsuit nor reasonably calculated to lead to the discovery of admissible evidence.

7 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
8 search, Plaintiff will produce responsive, non-privileged information within its custody and control
9 to the extent that such information exists.

10
11 **REQUEST NO. 57:**

12 Please produce all Documents upon which UEC intends to rely to establish the level of ordinary
13 skill in the art to which the subject matter of any of the claims of any Asserted Patents pertains.

14 **OBJECTIONS AND RESPONSE:**

15 Plaintiff incorporates each of its General Objections and Objections to Definitions and
16 Instructions as if fully set forth herein.

17 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
18 which are subject to more than one reasonable interpretation: "all Documents" and "establish the
19 level of ordinary skill in the art." Plaintiff notes that each patent potentially has a different level of
20 ordinary skill. Plaintiff will undertake to interpret these terms as they would in ordinary usage
21 given the context. Plaintiff objects to this request as overly broad and unduly burdensome
22 inasmuch as it purports to request the production of "all" or "each and every" document in the
23 requested category of documents. Such a request for all documents is unduly burdensome in
24 particular given the extremely broad definitions of "Document" supplied by Defendants and,
25 consequently, the request purports to require Plaintiff to collect documents from potentially every
26 employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects
27 responsive documents from a reasonable list of custodians whose job responsibilities would indicate
28 that they were in possession of potentially responsive information. Plaintiff objects to this request

1 to the extent it purports to request information that is within the public domain and accordingly is at
2 least as easily obtained by the Defendants. Plaintiff further objects to this request as overly broad
3 inasmuch as the request is not specific as to the timeframe for “establish[ing] the level of ordinary
4 skill in the art.”

5 Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and
6 search, Plaintiff will produce responsive, non-privileged information within its custody and control
7 to the extent that such information exists.

8
9 **REQUEST NO. 58:**

10 Please produce all Documents Concerning UEC’s first awareness of any activities, products, or
11 services of AGA that form the basis for any accusation of infringement of any of the Asserted
12 Patents.

13 **OBJECTIONS AND RESPONSE:**

14 Plaintiff incorporates each of its General Objections and Objections to Definitions and
15 Instructions as if fully set forth herein.

16 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
17 which are subject to more than one reasonable interpretation: “all Documents Concerning” and
18 “awareness.” Plaintiff will undertake to interpret these terms as they would in ordinary usage given
19 the context. Plaintiff objects to this request to the extent it purports to request the production of
20 information subject to the attorney-client privilege, the work product doctrine or any other
21 recognized privilege or immunity.

22 Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and
23 search, Plaintiff will produce responsive, non-privileged information within its custody and control
24 to the extent that such information exists.

25
26 **REQUEST NO. 59:**

27 Please produce all Documents Concerning any analysis of alleged infringement of any of the
28 Asserted Patents by any AGA product.

OBJECTIONS AND RESPONSE:

Plaintiff incorporates each of its General Objections and Objections to Definitions and Instructions as if fully set forth herein.

Plaintiff objects to this request to the extent it purports to request the production of information subject to the attorney-client privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff further objects to this request as premature inasmuch as discovery in this case has just begun and the Plaintiff has not yet completed its investigation of the relevant facts, the Court has not rendered any rulings or claim constructions and the parties have not completed expert discovery.

Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and search, Plaintiff will produce responsive, non-privileged information within its custody and control to the extent that such information exists.

REQUEST NO. 60:

Please produce all Documents Concerning the basis for UEC's allegations of AGA's alleged infringement.

OBJECTIONS AND RESPONSE:

Plaintiff incorporates each of its General Objections and Objections to Definitions and Instructions as if fully set forth herein.

Plaintiff objects to this request as vague and ambiguous in its use of the following terms, which are subject to more than one reasonable interpretation: "all Documents Concerning". Plaintiff will undertake to interpret these terms as they would in ordinary usage given the context.

Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it purports to request the production of "all" or "each and every" document in the requested category of documents. Such a request for all documents is unduly burdensome in particular given the extremely broad definitions of "Document" supplied by Defendants and, consequently, the request purports to require Plaintiff to collect documents from potentially every employee, agent or attorney

1 of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a
2 reasonable list of custodians whose job responsibilities would indicate that they were in possession
3 of potentially responsive information. Plaintiff objects to this request to the extent it purports to
4 request the production of information subject to the attorney-client privilege, the work product
5 doctrine or any other recognized privilege or immunity. Plaintiff objects to this request to the
6 extent that it purports to request information that is outside of the possession, custody or control of
7 Plaintiff. Plaintiff objects to this request as overly burdensome to the extent it purports to request
8 documents that are, or should be, within the possession custody and control of one or more of the
9 Defendants.

10 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
11 search, Plaintiff will produce responsive, non-privileged information within its custody and control
12 to the extent that such information exists.

13
14 **REQUEST NO. 61:**

15 Please produce all Documents Concerning all steps or efforts taken by UEC or others (including
16 UEC-acquired entities) to enforce any of the Asserted Patents against any person, including, but not
17 limited to, charges of infringement of any of the Asserted Patents.

18 **OBJECTIONS AND RESPONSE:**

19 Plaintiff incorporates each of its General Objections and Objections to Definitions and
20 Instructions as if fully set forth herein.

21 Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it
22 purports to request the production of "all" or "each and every" document in the requested category
23 of documents. Such a request for all documents is unduly burdensome in particular given the
24 extremely broad definitions of "Document" supplied by Defendants and, consequently, the request
25 purports to require Plaintiff to collect documents from potentially every employee, agent or attorney
26 of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a
27 reasonable list of custodians whose job responsibilities would indicate that they were in possession
28 of potentially responsive information. Plaintiff objects to this request to the extent it purports to

request information that is neither relevant to the subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff objects to this request to the extent it purports to request the production of information subject to the attorney-client privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff objects to this request to the extent it purports to request information that is within the public domain and accordingly is at least as easily obtained by the Defendants. Plaintiff objects to this request as overly burdensome to the extent it purports to request documents that are, or should be, within the possession custody and control of one or more of the Defendants. Plaintiff objects to this request as overly burdensome to the extent it purports to duplicate or overlap in subject matter with other requests propounded by the Defendants.

Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and search, Plaintiff will produce responsive, non-privileged information within its custody and control to the extent that such information exists.

REQUEST NO. 62:

Please produce all Documents Concerning the basis for UEC's claim of injunctive relief.

OBJECTIONS AND RESPONSE:

Plaintiff incorporates each of its General Objections and Objections to Definitions and Instructions as if fully set forth herein.

Plaintiff objects to this request as vague and ambiguous in its use of the following terms, which are subject to more than one reasonable interpretation: "all Documents Concerning." Plaintiff will undertake to interpret these terms as they would in ordinary usage given the context. Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it purports to request the production of "all" or "each and every" document in the requested category of documents. Such a request for all documents is unduly burdensome in particular given the extremely broad definitions of "Document" supplied by Defendants and, consequently, the request purports to require Plaintiff to collect documents from potentially every employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a

1 reasonable list of custodians whose job responsibilities would indicate that they were in possession
2 of potentially responsive information. Plaintiff objects to this request to the extent that it purports to
3 request information that is outside of the possession, custody or control of Plaintiff. Plaintiff
4 objects to this request as overly burdensome to the extent it purports to request documents that are,
5 or should be, within the possession custody and control of one or more of the Defendants.

6 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
7 search, Plaintiff will produce responsive, non-privileged information within its custody and control
8 to the extent that such information exists.

9
10 **REQUEST NO. 63:**

11 Please produce all Documents Concerning any other litigation, prospective litigation, re-
12 examination, reissue, inter parties review, or dispute involving any of the Asserted Patents or any
13 Related Patents.

14 **OBJECTIONS AND RESPONSE:**

15 Plaintiff incorporates each of its General Objections and Objections to Definitions and
16 Instructions as if fully set forth herein.

17 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
18 which are subject to more than one reasonable interpretation: "all Documents Concerning" and
19 "dispute." Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it
20 purports to request the production of "all" or "each and every" document in the requested category
21 of documents. Such a request for all documents is unduly burdensome in particular given the
22 extremely broad definitions of "Document" supplied by Defendants and, consequently, the request
23 purports to require Plaintiff to collect documents from potentially every employee, agent or attorney
24 of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a
25 reasonable list of custodians whose job responsibilities would indicate that they were in possession
26 of potentially responsive information. Plaintiff objects to this request to the extent it purports to
27 request the production of information subject to the attorney-client privilege, the work product
28 doctrine or any other recognized privilege or immunity. Plaintiff objects to this request to the

1 extent it purports to request information that is neither relevant to the subject matter of this lawsuit
2 nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff objects to this
3 request to the extent it purports to request information that is in the possession, custody or control of
4 third parties to this lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff
5 objects to this request to the extent it purports to request information that is within the public
6 domain and accordingly is at least as easily obtained by the Defendants. Plaintiff objects to this
7 request to the extent that it purports to request information that is outside of the possession, custody
8 or control of Plaintiff. Plaintiff objects to this request as overly burdensome to the extent it purports
9 to request documents that are, or should be, within the possession custody and control of one or
10 more of the Defendants.

11 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
12 search, Plaintiff will produce responsive, non-privileged information within its custody and control
13 to the extent that such information exists.

14
15 **REQUEST NO. 64:**

16 Please produce all Documents Concerning any patent marking in connection with any of the
17 Asserted Patents, or any other alleged compliance by UEC with 35 U.S.C. Section 287(a).

18 **OBJECTIONS AND RESPONSE:**

19 Plaintiff incorporates each of its General Objections and Objections to Definitions and
20 Instructions as if fully set forth herein.

21 Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it
22 purports to request the production of "all" or "each and every" document in the requested category
23 of documents. Such a request for all documents is unduly burdensome in particular given the
24 extremely broad definitions of "Document" supplied by Defendants and, consequently, the request
25 purports to require Plaintiff to collect documents from potentially every employee, agent or attorney
26 of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a
27 reasonable list of custodians whose job responsibilities would indicate that they were in possession
28 of potentially responsive information. Plaintiff objects to this request to the extent it purports to

1 request information that is neither relevant to the subject matter of this lawsuit nor reasonably
2 calculated to lead to the discovery of admissible evidence.

3 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
4 search, Plaintiff will produce responsive, non-privileged information within its custody and control
5 to the extent that such information exists.

6
7 **REQUEST NO. 65:**

8 Please produce all license, assignment, or settlement agreements Concerning the alleged inventions
9 claimed in any of the Asserted Patents and any Documents evidencing, recording, or related to
10 payments made under such agreements.

11 **OBJECTIONS AND RESPONSE:**

12 Plaintiff incorporates each of its General Objections and Objections to Definitions and
13 Instructions as if fully set forth herein.

14 Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it
15 purports to request the production of "all" or "each and every" document in the requested category
16 of documents. Such a request for all documents is unduly burdensome in particular given the
17 extremely broad definitions of "Document" supplied by Defendants and, consequently, the request
18 purports to require Plaintiff to collect documents from potentially every employee, agent or attorney
19 of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a
20 reasonable list of custodians whose job responsibilities would indicate that they were in possession
21 of potentially responsive information. Plaintiff objects to this request to the extent it purports to
22 request information that is in the possession, custody or control of third parties to this lawsuit and
23 not within the possession, custody and control of Plaintiff. Plaintiff objects to this request as overly
24 burdensome to the extent it purports to duplicate or overlap in subject matter with other requests
25 propounded by the Defendants.

26 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
27 search, Plaintiff will produce responsive, non-privileged information within its custody and control
28 to the extent that such information exists.

REQUEST NO. 66:

Please produce all Documents Concerning any communications, agreements, discussions, negotiations, inquiries, or proposals relating to the licensing or assignment of the inventions claimed in any of the Asserted Patents (including cease and desist letters and any communications relating thereto).

OBJECTIONS AND RESPONSE:

Plaintiff incorporates each of its General Objections and Objections to Definitions and Instructions as if fully set forth herein.

Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it purports to request the production of “all” or “each and every” document in the requested category of documents. Such a request for all documents is unduly burdensome in particular given the extremely broad definitions of “Document” supplied by Defendants and, consequently, the request purports to require Plaintiff to collect documents from potentially every employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a reasonable list of custodians whose job responsibilities would indicate that they were in possession of potentially responsive information. Plaintiff objects to this request to the extent it purports to request the production of information subject to the attorney-client privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff objects to this request to the extent it purports to request information that is in the possession, custody or control of third parties to this lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff objects to this request to the extent that it purports to request information that is outside of the possession, custody or control of Plaintiff.

Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and search, Plaintiff will produce responsive, non-privileged information within its custody and control to the extent that such information exists.

REQUEST NO. 67:

Please produce all Documents Concerning any license, offer to license, or attempt to license any of

1 the Asserted Patents or any Related Patents, or any Patents owned by UEC or UEC-Acquired Entities
2 to any person-whether or not the offer or attempt has resulted in a license-including, without
3 limitation, Documents regarding the rights being offered, the consideration paid or to be paid, any
4 proposed or actual royalty rate or payment, any actual or projected revenues or profits, and those
5 persons involved in the negotiation regarding such license or attempt to license.

6 **OBJECTIONS AND RESPONSE:**

7 Plaintiff incorporates each of its General Objections and Objections to Definitions and
8 Instructions as if fully set forth herein.

9 Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it
10 purports to request the production of “all” or “each and every” document in the requested category
11 of documents. Such a request for all documents is unduly burdensome in particular given the
12 extremely broad definitions of “Document” supplied by Defendants and, consequently, the request
13 purports to require Plaintiff to collect documents from potentially every employee, agent or attorney
14 of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a
15 reasonable list of custodians whose job responsibilities would indicate that they were in possession
16 of potentially responsive information. Plaintiff objects to this request to the extent it purports to
17 request the production of information subject to the attorney-client privilege, the work product
18 doctrine or any other recognized privilege or immunity. Plaintiff objects to this request to the
19 extent it purports to request information that is in the possession, custody or control of third parties
20 to this lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff objects to
21 this request to the extent that it purports to request information that is outside of the possession,
22 custody or control of Plaintiff.

23 Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and
24 search, Plaintiff will produce responsive, non-privileged information within its custody and control
25 to the extent that such information exists.

26
27 **REQUEST NO. 68:**

28 Please produce all Documents Concerning any assessment, analysis, study, forecast, plan, reports,

1 valuation, projection, evaluation, expectation, presentation, proposal, or discussion of the actual or
2 projected monetary value to UEC or other indicia of value to any person of the alleged inventions
3 claimed in any of the Asserted Patents including, without limitation, Documents regarding UEC's
4 actual, planned, forecast, or expected revenues or profits from licensing any of the Asserted Patents.

5 **OBJECTIONS AND RESPONSE:**

6 Plaintiff incorporates each of its General Objections and Objections to Definitions and
7 Instructions as if fully set forth herein.

8 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
9 which are subject to more than one reasonable interpretation: "all Documents Concerning" and
10 "discussion". Plaintiff will undertake to interpret these terms as they would in ordinary usage given
11 the context. Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it
12 purports to request the production of "all" or "each and every" document in the requested category
13 of documents. Such a request for all documents is unduly burdensome in particular given the
14 extremely broad definitions of "Document" supplied by Defendants and, consequently, the request
15 purports to require Plaintiff to collect documents from potentially every employee, agent or attorney
16 of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a
17 reasonable list of custodians whose job responsibilities would indicate that they were in possession
18 of potentially responsive information. Plaintiff objects to this request to the extent it purports to
19 request the production of information subject to the attorney-client privilege, the work product
20 doctrine or any other recognized privilege or immunity. Plaintiff objects to this request to the
21 extent that it is not reasonably limited to a time period relevant to the causes of action and claims at
22 issue in this lawsuit.

23 Plaintiff objects to this request as overly burdensome to the extent it purports to request documents
24 that are, or should be, within the possession custody and control of one or more of the Defendants.

25 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
26 search, Plaintiff will produce responsive, non-privileged information within its custody and control
27 to the extent that such information exists.

REQUEST NO. 69:

Please produce all Documents Concerning patent procurement policies, patent enforcement policies, competitor product review policies, or patent licensing policies of UEC since January 1, 2007.

OBJECTIONS AND RESPONSE:

Plaintiff incorporates each of its General Objections and Objections to Definitions and Instructions as if fully set forth herein.

Plaintiff objects to this request as vague and ambiguous in its use of the following terms, which are subject to more than one reasonable interpretation: “all Documents Concerning,” “patent procurement policies,” “competitor product review policies” and “patent licensing policies.” Plaintiff will undertake to interpret these terms as they would in ordinary usage given the context. Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it purports to request the production of “all” or “each and every” document in the requested category of documents. Such a request for all documents is unduly burdensome in particular given the extremely broad definitions of “Document” supplied by Defendants and, consequently, the request purports to require Plaintiff to collect documents from potentially every employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a reasonable list of custodians whose job responsibilities would indicate that they were in possession of potentially responsive information. Plaintiff objects to this request to the extent it purports to request the production of information subject to the attorney-client privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff objects to this request to the extent it purports to request information that is neither relevant to the subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff objects to this request to the extent that it is not reasonably limited to a time period relevant to the causes of action and claims at issue in this lawsuit.

Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and search, Plaintiff will produce responsive, non-privileged information within its custody and control to the extent that such information exists.

1 **REQUEST NO. 70:**

2 Please produce all Documents Concerning any alleged nexus, or lack thereof, between any alleged
3 commercial success of the subject matter of any claim of any of the Asserted Patents and the alleged
4 advantages of that subject matter.

5 **OBJECTIONS AND RESPONSE:**

6 Plaintiff incorporates each of its General Objections and Objections to Definitions and
7 Instructions as if fully set forth herein.

8 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
9 which are subject to more than one reasonable interpretation: “all Documents Concerning,”
10 “alleged nexus, or lack thereof” and “alleged advantages of that subject matter.” Plaintiff will
11 undertake to interpret these terms as they would in ordinary usage given the context. Plaintiff
12 objects to this request as overly broad and unduly burdensome inasmuch as it purports to request the
13 production of “all” or “each and every” document in the requested category of documents. Such a
14 request for all documents is unduly burdensome in particular given the extremely broad definitions
15 of “Document” supplied by Defendants and, consequently, the request purports to require Plaintiff
16 to collect documents from potentially every employee, agent or attorney of Plaintiff rather than
17 conduct a reasonable investigation that collects responsive documents from a reasonable list of
18 custodians whose job responsibilities would indicate that they were in possession of potentially
19 responsive information. Plaintiff objects to this request to the extent it purports to request the
20 production of information subject to the attorney-client privilege, the work product doctrine or any
21 other recognized privilege or immunity. Plaintiff objects to this request to the extent it purports to
22 request information that is neither relevant to the subject matter of this lawsuit nor reasonably
23 calculated to lead to the discovery of admissible evidence. Plaintiff objects to this request to the
24 extent it purports to request information that is in the possession, custody or control of third parties
25 to this lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff objects to
26 this request to the extent it purports to request information that is within the public domain and
27 accordingly is at least as easily obtained by the Defendants. Plaintiff objects to this request to the
28 extent that it purports to request information that is outside of the possession, custody or control of

1 Plaintiff. Plaintiff objects to this request as overly burdensome to the extent it purports to request
2 documents that are, or should be, within the possession custody and control of one or more of the
3 Defendants. Plaintiff objects to this request as overly burdensome to the extent it purports to
4 duplicate or overlap in subject matter with other requests propounded by the Defendants. Plaintiff
5 objects to this request to the extent it requires a legal conclusion in order to interpret the request.

6 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
7 search, Plaintiff will produce responsive, non-privileged information within its custody and control
8 to the extent that such information exists.

9
10 **REQUEST NO. 71:**

11 Please produce all Documents Concerning the nature and scope of any alleged irreparable injury
12 suffered by UEC as a result of the alleged infringement of any of the Asserted Patents absent an
13 injunction against AGA in this matter.

14 **OBJECTIONS AND RESPONSE:**

15 Plaintiff incorporates each of its General Objections and Objections to Definitions and
16 Instructions as if fully set forth herein.

17 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
18 which are subject to more than one reasonable interpretation: "all Documents Concerning" and
19 "nature and scope." Plaintiff will undertake to interpret these terms as they would in ordinary usage
20 given the context. Plaintiff objects to this request as overly broad and unduly burdensome
21 inasmuch as it purports to request the production of "all" or "each and every" document in the
22 requested category of documents. Such a request for all documents is unduly burdensome in
23 particular given the extremely broad definitions of "Document" supplied by Defendants and,
24 consequently, the request purports to require Plaintiff to collect documents from potentially every
25 employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects
26 responsive documents from a reasonable list of custodians whose job responsibilities would indicate
27 that they were in possession of potentially responsive information. Plaintiff objects to this request
28 to the extent it purports to request the production of information subject to the attorney-client

1 privilege, the work product doctrine or any other recognized privilege or immunity.

2 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
3 search, Plaintiff will produce responsive, non-privileged information within its custody and control
4 to the extent that such information exists.

5
6 **REQUEST NO. 72:**

7 Please produce all Documents Concerning remedies available at law are adequate to compensate
8 UEC for the alleged infringement of any Asserted Patent by AGA.

9 **OBJECTIONS AND RESPONSE:**

10 Plaintiff incorporates each of its General Objections and Objections to Definitions and
11 Instructions as if fully set forth herein.

12 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
13 which are subject to more than one reasonable interpretation: "all Documents
14 Concerning." Plaintiff will undertake to interpret these terms as they would in ordinary usage given
15 the context. Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it
16 purports to request the production of "all" or "each and every" document in the requested category
17 of documents. Such a request for all documents is unduly burdensome in particular given the
18 extremely broad definitions of "Document" supplied by Defendants and, consequently, the request
19 purports to require Plaintiff to collect documents from potentially every employee, agent or attorney
20 of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a
21 reasonable list of custodians whose job responsibilities would indicate that they were in possession
22 of potentially responsive information. Plaintiff objects to this request to the extent it purports to
23 request the production of information subject to the attorney-client privilege, the work product
24 doctrine or any other recognized privilege or immunity. Plaintiff objects to this request to the
25 extent it purports to request information that is in the possession, custody or control of third parties
26 to this lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff objects to
27 this request to the extent that it purports to request information that is outside of the possession,
28 custody or control of Plaintiff.

1 Plaintiff objects to this request as overly burdensome to the extent it purports to request documents
2 that are, or should be, within the possession custody and control of one or more of the Defendants.

3 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
4 search, Plaintiff will produce responsive, non-privileged information within its custody and control
5 to the extent that such information exists.

6
7 **REQUEST NO. 73:**

8 Please produce all Documents Concerning whether the balance of hardships weighs in favor of or
9 against AGA for the alleged infringement of any of the Asserted Patents.

10 **OBJECTIONS AND RESPONSE:**

11 Plaintiff incorporates each of its General Objections and Objections to Definitions and
12 Instructions as if fully set forth herein.

13 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
14 which are subject to more than one reasonable interpretation: "all Documents Concerning" and
15 "balance of hardships." Plaintiff will undertake to interpret these terms as they would in ordinary
16 usage given the context. Plaintiff objects to this request as overly broad and unduly burdensome
17 inasmuch as it purports to request the production of "all" or "each and every" document in the
18 requested category of documents. Such a request for all documents is unduly burdensome in
19 particular given the extremely broad definitions of "Document" supplied by Defendants and,
20 consequently, the request purports to require Plaintiff to collect documents from potentially every
21 employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects
22 responsive documents from a reasonable list of custodians whose job responsibilities would indicate
23 that they were in possession of potentially responsive information. Plaintiff objects to this request
24 to the extent it purports to request the production of information subject to the attorney-client
25 privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff
26 objects to this request to the extent it purports to request information that is neither relevant to the
27 subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible
28 evidence. Plaintiff objects to this request to the extent it purports to request information that is in

1 the possession, custody or control of third parties to this lawsuit and not within the possession,
 2 custody and control of Plaintiff. Plaintiff objects to this request to the extent that it purports to
 3 request information that is outside of the possession, custody or control of Plaintiff. Plaintiff
 4 objects to this request as overly burdensome to the extent it purports to request documents that are,
 5 or should be, within the possession custody and control of one or more of the Defendants.

6 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
 7 search, Plaintiff will produce responsive, non-privileged information within its custody and control
 8 to the extent that such information exists.

9
 10 **REQUEST NO. 74:**

11 Please produce all Documents Concerning UEC's contention that UEC is entitled to an injunction
 12 against AGA related to the Asserted Patents.

13 **OBJECTIONS AND RESPONSE:**

14 Plaintiff incorporates each of its General Objections and Objections to Definitions and
 15 Instructions as if fully set forth herein.

16 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
 17 which are subject to more than one reasonable interpretation: "all Documents
 18 Concerning." Plaintiff will undertake to interpret these terms as they would in ordinary usage given
 19 the context. Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it
 20 purports to request the production of "all" or "each and every" document in the requested category
 21 of documents. Such a request for all documents is unduly burdensome in particular given the
 22 extremely broad definitions of "Document" supplied by Defendants and, consequently, the request
 23 purports to require Plaintiff to collect documents from potentially every employee, agent or attorney
 24 of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a
 25 reasonable list of custodians whose job responsibilities would indicate that they were in possession
 26 of potentially responsive information. Plaintiff objects to this request to the extent it purports to
 27 request the production of information subject to the attorney-client privilege, the work product
 28 doctrine or any other recognized privilege or immunity. Plaintiff objects to this request to the

1 extent it purports to request information that is in the possession, custody or control of third parties
 2 to this lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff objects to
 3 this request to the extent that it purports to request information that is outside of the possession,
 4 custody or control of Plaintiff.

5 Plaintiff objects to this request as overly burdensome to the extent it purports to duplicate or
 6 overlap in subject matter with other requests propounded by the Defendants. Plaintiff further
 7 objects to this request as premature inasmuch as discovery in this case has just begun and the
 8 Plaintiff has not yet completed its investigation of the relevant facts, the Court has not rendered any
 9 rulings or claim constructions and the parties have not completed expert discovery.

10 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
 11 search, Plaintiff will produce responsive, non-privileged information within its custody and control
 12 to the extent that such information exists.

13
 14 **REQUEST NO. 75:**

15 Please produce Documents sufficient to describe each lost sale of UEC that UEC contends is the result
 16 of any alleged infringement by AGA as it relates to the Asserted Patents.

17 **OBJECTIONS AND RESPONSE:**

18 Plaintiff incorporates each of its General Objections and Objections to Definitions and
 19 Instructions as if fully set forth herein.

20 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
 21 which are subject to more than one reasonable interpretation: "Documents sufficient to
 22 describe." Plaintiff will undertake to interpret these terms as they would in ordinary usage given the
 23 context. Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it
 24 purports to request the production of "all" or "each and every" document in the requested category
 25 of documents. Such a request for all documents is unduly burdensome in particular given the
 26 extremely broad definitions of "Document" supplied by Defendants and, consequently, the request
 27 purports to require Plaintiff to collect documents from potentially every employee, agent or attorney
 28 of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a

1 reasonable list of custodians whose job responsibilities would indicate that they were in possession
2 of potentially responsive information. Plaintiff objects to this request to the extent it purports to
3 request information that is in the possession, custody or control of third parties to this lawsuit and
4 not within the possession, custody and control of Plaintiff. Plaintiff objects to this request to the
5 extent that it purports to request information that is outside of the possession, custody or control of
6 Plaintiff. Plaintiff objects to this request as overly burdensome to the extent it purports to request
7 documents that are, or should be, within the possession custody and control of one or more of the
8 Defendants. Plaintiff objects to this request as overly burdensome to the extent it purports to
9 duplicate or overlap in subject matter with other requests propounded by the Defendants.

10 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
11 search, Plaintiff will produce responsive, non-privileged information within its custody and control
12 to the extent that such information exists.

13
14 **REQUEST NO. 76:**

15 Please produce Documents sufficient to describe the harm to UEC that UEC contends is the result
16 of any alleged infringement by AGA as it relates to the Asserted Patents.

17 **OBJECTIONS AND RESPONSE:**

18 Plaintiff incorporates each of its General Objections and Objections to Definitions and
19 Instructions as if fully set forth herein.

20 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
21 which are subject to more than one reasonable interpretation: "Documents sufficient to
22 describe." Plaintiff will undertake to interpret these terms as they would in ordinary usage given the
23 context. Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it
24 purports to request the production of "all" or "each and every" document in the requested category
25 of documents. Such a request for all documents is unduly burdensome in particular given the
26 extremely broad definitions of "Document" supplied by Defendants and, consequently, the request
27 purports to require Plaintiff to collect documents from potentially every employee, agent or attorney
28 of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a

1 reasonable list of custodians whose job responsibilities would indicate that they were in possession
 2 of potentially responsive information. Plaintiff objects to this request to the extent it purports to
 3 request information that is in the possession, custody or control of third parties to this lawsuit and
 4 not within the possession, custody and control of Plaintiff. Plaintiff objects to this request to the
 5 extent that it purports to request information that is outside of the possession, custody or control of
 6 Plaintiff. Plaintiff objects to this request as overly burdensome to the extent it purports to request
 7 documents that are, or should be, within the possession custody and control of one or more of the
 8 Defendants. Plaintiff objects to this request as overly burdensome to the extent it purports to
 9 duplicate or overlap in subject matter with other requests propounded by the Defendants.

10 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
 11 search, Plaintiff will produce responsive, non-privileged information within its custody and control
 12 to the extent that such information exists.

13
 14 **REQUEST NO. 77:**

15 Please produce all Documents Concerning agreements entered between UEC and AGA Concerning
 16 the Asserted Patents.

17 **OBJECTIONS AND RESPONSE:**

18 Plaintiff incorporates each of its General Objections and Objections to Definitions and
 19 Instructions as if fully set forth herein.

20 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
 21 which are subject to more than one reasonable interpretation: "all Documents
 22 Concerning." Plaintiff will undertake to interpret these terms as they would in ordinary usage given
 23 the context. Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it
 24 purports to request the production of "all" or "each and every" document in the requested category
 25 of documents. Such a request for all documents is unduly burdensome in particular given the
 26 extremely broad definitions of "Document" supplied by Defendants and, consequently, the request
 27 purports to require Plaintiff to collect documents from potentially every employee, agent or attorney
 28 of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a

1 reasonable list of custodians whose job responsibilities would indicate that they were in possession
2 of potentially responsive information. Plaintiff objects to this request to the extent it purports to
3 request the production of information subject to the attorney-client privilege, the work product
4 doctrine or any other recognized privilege or immunity. Plaintiff objects to this request to the
5 extent it purports to request information that is neither relevant to the subject matter of this lawsuit
6 nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff objects to this
7 request to the extent it purports to request information that is within the public domain and
8 accordingly is at least as easily obtained by the Defendants. Plaintiff objects to this request to the
9 extent that it is not reasonably limited to a time period relevant to the causes of action and claims at
10 issue in this lawsuit.

11 Plaintiff objects to this request to the extent that it purports to request information that is outside of
12 the possession, custody or control of Plaintiff. Plaintiff objects to this request as overly
13 burdensome to the extent it purports to request documents that are, or should be, within the
14 possession custody and control of one or more of the Defendants. Plaintiff objects to this request
15 as overly burdensome to the extent it purports to duplicate or overlap in subject matter with other
16 requests propounded by the Defendants.

17 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
18 search, Plaintiff will produce responsive, non-privileged information within its custody and control
19 to the extent that such information exists.

20
21 **REQUEST NO. 78:**

22 Please produce all Documents Concerning communications between UEC and AGA Concerning
23 the Asserted Patents.

24 **OBJECTIONS AND RESPONSE:**

25 Plaintiff incorporates each of its General Objections and Objections to Definitions and
26 Instructions as if fully set forth herein.

27 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
28 which are subject to more than one reasonable interpretation: "all Documents Concerning" and

“communications.” Plaintiff will undertake to interpret these terms as they would in ordinary usage given the context. Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it purports to request the production of “all” or “each and every” document in the requested category of documents. Such a request for all documents is unduly burdensome in particular given the extremely broad definitions of “Document” supplied by Defendants and, consequently, the request purports to require Plaintiff to collect documents from potentially every employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a reasonable list of custodians whose job responsibilities would indicate that they were in possession of potentially responsive information. Plaintiff objects to this request to the extent it purports to request the production of information subject to the attorney-client privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff objects to this request to the extent that it purports to request information that is outside of the possession, custody or control of Plaintiff. Plaintiff objects to this request as overly burdensome to the extent it purports to request documents that are, or should be, within the possession custody and control of one or more of the Defendants. Plaintiff objects to this request as overly burdensome to the extent it purports to duplicate or overlap in subject matter with other requests propounded by the Defendants.

Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and search, Plaintiff will produce responsive, non-privileged information within its custody and control to the extent that such information exists.

SIC Investigation/Report

REQUEST NO. 79:

Please produce all Documents in support of paragraph 67 of the Second Amended Complaint which states “In June 2017, UEC became aware of a possibility that Okada engaged in misconduct in relation to foreign business. In response to this misconduct, UEC established a Special Investigation Committee formed by outside experts to investigate Okada.”

OBJECTIONS AND RESPONSE:

1 Plaintiff incorporates each of its General Objections and Objections to Definitions and
2 Instructions as if fully set forth herein.

3 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
4 which are subject to more than one reasonable interpretation: “all Documents in support.” Plaintiff
5 will undertake to interpret these terms as they would in ordinary usage given the context. Plaintiff
6 objects to this request as overly broad and unduly burdensome inasmuch as it purports to request the
7 production of “all” or “each and every” document in the requested category of documents. Such a
8 request for all documents is unduly burdensome in particular given the extremely broad definitions
9 of “Document” supplied by Defendants and, consequently, the request purports to require Plaintiff
10 to collect documents from potentially every employee, agent or attorney of Plaintiff rather than
11 conduct a reasonable investigation that collects responsive documents from a reasonable list of
12 custodians whose job responsibilities would indicate that they were in possession of potentially
13 responsive information. Plaintiff objects to this request to the extent it purports to request the
14 production of information subject to the attorney-client privilege, the work product doctrine or any
15 other recognized privilege or immunity. Plaintiff objects to this request to the extent it purports to
16 request information that is in the possession, custody or control of third parties to this lawsuit and
17 not within the possession, custody and control of Plaintiff. Plaintiff objects to this request to the
18 extent that it purports to request information that is outside of the possession, custody or control of
19 Plaintiff.

20 Plaintiff objects to this request as overly burdensome to the extent it purports to request documents
21 that are, or should be, within the possession custody and control of one or more of the Defendants.

22 Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and
23 search, Plaintiff will produce responsive, non-privileged information within its custody and control
24 to the extent that such information exists.

25
26 **REQUEST NO. 80:**

27 Please produce all Documents in support of paragraph 68 of the Second Amended Complaint
28 which states “On August 29, 2017, the Special Investigation Committee reported the result of the

1 investigation to UEC. This identified the fact that Okada had caused UEC damages worth at least
 2 JPY 2.2 billion due to his misconduct through the foreign business done for his personal gain during
 3 2013 – 2015. In response to the work of the Special Investigation Committee, UEC personnel
 4 further reviewed Okada’s activities and they discovered the fact that AGA was making
 5 unauthorized use of UEC patent rights, including the Asserted Patents, and that Okada had
 6 concealed these facts.”

7 **OBJECTIONS AND RESPONSE:**

8 Plaintiff incorporates each of its General Objections and Objections to Definitions and
 9 Instructions as if fully set forth herein.

10 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
 11 which are subject to more than one reasonable interpretation: “all Documents in support.” Plaintiff
 12 will undertake to interpret these terms as they would in ordinary usage given the context. Plaintiff
 13 objects to this request as overly broad and unduly burdensome inasmuch as it purports to request the
 14 production of “all” or “each and every” document in the requested category of documents. Such a
 15 request for all documents is unduly burdensome in particular given the extremely broad definitions
 16 of “Document” supplied by Defendants and, consequently, the request purports to require Plaintiff
 17 to collect documents from potentially every employee, agent or attorney of Plaintiff rather than
 18 conduct a reasonable investigation that collects responsive documents from a reasonable list of
 19 custodians whose job responsibilities would indicate that they were in possession of potentially
 20 responsive information. Plaintiff objects to this request to the extent it purports to request the
 21 production of information subject to the attorney-client privilege, the work product doctrine or any
 22 other recognized privilege or immunity. Plaintiff objects to this request to the extent it purports to
 23 request information that is in the possession, custody or control of third parties to this lawsuit and
 24 not within the possession, custody and control of Plaintiff. Plaintiff objects to this request to the
 25 extent that it purports to request information that is outside of the possession, custody or control of
 26 Plaintiff.

27 Plaintiff objects to this request as overly burdensome to the extent it purports to request documents
 28 that are, or should be, within the possession custody and control of one or more of the Defendants.

1 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
2 search, Plaintiff will produce responsive, non-privileged information within its custody and control
3 to the extent that such information exists.

4
5 **REQUEST NO. 81:**

6 Please produce all Documents Concerning the formation of the Special Investigation Committee,
7 including but not limited to the members who were selected to serve on the Special Investigation
8 Committee.

9 **OBJECTIONS AND RESPONSE:**

10 Plaintiff incorporates each of its General Objections and Objections to Definitions and
11 Instructions as if fully set forth herein.

12 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
13 which are subject to more than one reasonable interpretation: "all Documents Concerning" and "the
14 formation." Plaintiff will undertake to interpret these terms as they would in ordinary usage given
15 the context. Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it
16 purports to request the production of "all" or "each and every" document in the requested category
17 of documents. Such a request for all documents is unduly burdensome in particular given the
18 extremely broad definitions of "Document" supplied by Defendants and, consequently, the request
19 purports to require Plaintiff to collect documents from potentially every employee, agent or attorney
20 of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a
21 reasonable list of custodians whose job responsibilities would indicate that they were in possession
22 of potentially responsive information. Plaintiff objects to this request to the extent it purports to
23 request the production of information subject to the attorney-client privilege, the work product
24 doctrine or any other recognized privilege or immunity. Plaintiff objects to this request to the
25 extent it purports to request information that is neither relevant to the subject matter of this lawsuit
26 nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff objects to this
27 request to the extent that it purports to request information that is outside of the possession, custody
28 or control of Plaintiff. Plaintiff objects to this request as overly burdensome to the extent it

purports to request documents that are, or should be, within the possession custody and control of one or more of the Defendants. Plaintiff objects to this request as overly burdensome to the extent it purports to duplicate or overlap in subject matter with other requests propounded by the Defendants.

Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and search, Plaintiff will produce responsive, non-privileged information within its custody and control to the extent that such information exists.

REQUEST NO. 82:

Please produce all Documents Concerning any reports, including any drafts of the Special Investigation Committee report, from May 23, 2017 to the present, which is referenced in paragraph 68 of the Second Amended Complaint.

OBJECTIONS AND RESPONSE:

Plaintiff incorporates each of its General Objections and Objections to Definitions and Instructions as if fully set forth herein.

Plaintiff objects to this request as vague and ambiguous in its use of the following terms, which are subject to more than one reasonable interpretation: "all Documents Concerning" and "report, including any drafts of the Special Investigation Committee report." Plaintiff will undertake to interpret these terms as they would in ordinary usage given the context. Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it purports to request the production of "all" or "each and every" document in the requested category of documents. Such a request for all documents is unduly burdensome in particular given the extremely broad definitions of "Document" supplied by Defendants and, consequently, the request purports to require Plaintiff to collect documents from potentially every employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a reasonable list of custodians whose job responsibilities would indicate that they were in possession of potentially responsive information. Plaintiff objects to this request to the extent it purports to request the production of information subject to the attorney-client privilege, the work product doctrine or any

1 other recognized privilege or immunity. Plaintiff objects to this request to the extent it purports to
 2 request information that is neither relevant to the subject matter of this lawsuit nor reasonably
 3 calculated to lead to the discovery of admissible evidence. Plaintiff objects to this request to the
 4 extent it purports to request information that is in the possession, custody or control of third parties
 5 to this lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff objects to
 6 this request to the extent it purports to request information that is within the public domain and
 7 accordingly is at least as easily obtained by the Defendants. Plaintiff objects to this request to the
 8 extent that it purports to request information that is outside of the possession, custody or control of
 9 Plaintiff.

10 Plaintiff objects to this request as overly burdensome to the extent it purports to request documents
 11 that are, or should be, within the possession custody and control of one or more of the Defendants.
 12 Plaintiff objects to this request as overly burdensome to the extent it purports to duplicate or overlap
 13 in subject matter with other requests propounded by the Defendants.

14 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
 15 search, Plaintiff will produce responsive, non-privileged information within its custody and control
 16 to the extent that such information exists.

17
 18 **REQUEST NO. 83:**

19 Please produce all Documents provided to the Special Investigation Committee as referenced in
 20 paragraphs 67 – 68 of the Second Amended Complaint.

21 **OBJECTIONS AND RESPONSE:**

22 Plaintiff incorporates each of its General Objections and Objections to Definitions and
 23 Instructions as if fully set forth herein.

24 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
 25 which are subject to more than one reasonable interpretation: "all Documents provided." Plaintiff
 26 will undertake to interpret these terms as they would in ordinary usage given the context. Plaintiff
 27 objects to this request as overly broad and unduly burdensome inasmuch as it purports to request the
 28 production of "all" or "each and every" document in the requested category of documents. Such a

1 request for all documents is unduly burdensome in particular given the extremely broad definitions
2 of “Document” supplied by Defendants and, consequently, the request purports to require Plaintiff
3 to collect documents from potentially every employee, agent or attorney of Plaintiff rather than
4 conduct a reasonable investigation that collects responsive documents from a reasonable list of
5 custodians whose job responsibilities would indicate that they were in possession of potentially
6 responsive information. Plaintiff objects to this request to the extent it purports to request the
7 production of information subject to the attorney-client privilege, the work product doctrine or any
8 other recognized privilege or immunity. Plaintiff objects to this request to the extent it purports to
9 request information that is neither relevant to the subject matter of this lawsuit nor reasonably
10 calculated to lead to the discovery of admissible evidence. Plaintiff objects to this request to the
11 extent it purports to request information that is within the public domain and accordingly is at least
12 as easily obtained by the Defendants. Plaintiff objects to this request to the extent that it purports to
13 request information that is outside of the possession, custody or control of Plaintiff. Plaintiff
14 objects to this request as overly burdensome to the extent it purports to request documents that are,
15 or should be, within the possession custody and control of one or more of the Defendants. Plaintiff
16 objects to this request as overly burdensome to the extent it purports to duplicate or overlap in
17 subject matter with other requests propounded by the Defendants.

18 Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and
19 search, Plaintiff will produce responsive, non-privileged information within its custody and control
20 to the extent that such information exists.

21
22 **REQUEST NO. 84:**

23 Please produce all Documents Concerning the Special Investigation Committee investigation and
24 report as referenced in paragraphs 67 – 68 of the Second Amended Complaint.

25 **OBJECTIONS AND RESPONSE:**

26 Plaintiff incorporates each of its General Objections and Objections to Definitions and
27 Instructions as if fully set forth herein.

28 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,

1 which are subject to more than one reasonable interpretation: “all Documents
2 Concerning.” Plaintiff will undertake to interpret these terms as they would in ordinary usage given
3 the context. Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it
4 purports to request the production of “all” or “each and every” document in the requested category
5 of documents. Such a request for all documents is unduly burdensome in particular given the
6 extremely broad definitions of “Document” supplied by Defendants and, consequently, the request
7 purports to require Plaintiff to collect documents from potentially every employee, agent or attorney
8 of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a
9 reasonable list of custodians whose job responsibilities would indicate that they were in possession
10 of potentially responsive information. Plaintiff objects to this request to the extent it purports to
11 request the production of information subject to the attorney-client privilege, the work product
12 doctrine or any other recognized privilege or immunity. Plaintiff objects to this request to the
13 extent it purports to request information that is neither relevant to the subject matter of this lawsuit
14 nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff objects to this
15 request to the extent it purports to request information that is in the possession, custody or control of
16 third parties to this lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff
17 objects to this request to the extent it purports to request information that is within the public
18 domain and accordingly is at least as easily obtained by the Defendants. Plaintiff objects to this
19 request to the extent that it is not reasonably limited to a time period relevant to the causes of action
20 and claims at issue in this lawsuit.

21 Plaintiff objects to this request to the extent that it purports to request information that is outside of
22 the possession, custody or control of Plaintiff. Plaintiff objects to this request as overly
23 burdensome to the extent it purports to request documents that are, or should be, within the
24 possession custody and control of one or more of the Defendants. Plaintiff objects to this request
25 as overly burdensome to the extent it purports to duplicate or overlap in subject matter with other
26 requests propounded by the Defendants.

27 Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and
28 search, Plaintiff will produce responsive, non-privileged information within its custody and control

1 to the extent that such information exists.

2
3 **REQUEST NO. 85:**

4 Please produce all Documents Concerning any written communications, text messages or emails
5 referenced in any draft or final report by the Special Investigation Committee as referenced in
6 paragraphs 67 – 68 of the Second Amended Complaint.

7 **OBJECTIONS AND RESPONSE:**

8 Plaintiff incorporates each of its General Objections and Objections to Definitions and
9 Instructions as if fully set forth herein.

10 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
11 which are subject to more than one reasonable interpretation: “all Documents
12 Concerning.” Plaintiff will undertake to interpret these terms as they would in ordinary usage given
13 the context. Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it
14 purports to request the production of “all” or “each and every” document in the requested category
15 of documents. Such a request for all documents is unduly burdensome in particular given the
16 extremely broad definitions of “Document” supplied by Defendants and, consequently, the request
17 purports to require Plaintiff to collect documents from potentially every employee, agent or attorney
18 of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a
19 reasonable list of custodians whose job responsibilities would indicate that they were in possession
20 of potentially responsive information. Plaintiff objects to this request to the extent it purports to
21 request the production of information subject to the attorney-client privilege, the work product
22 doctrine or any other recognized privilege or immunity. Plaintiff objects to this request to the
23 extent it purports to request information that is neither relevant to the subject matter of this lawsuit
24 nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff objects to this
25 request to the extent that it purports to request information that is outside of the possession, custody
26 or control of Plaintiff.

27 Plaintiff objects to this request to the extent it purports to request information that is in the
28 possession, custody or control of third parties to this lawsuit and not within the possession, custody

1 and control of Plaintiff. Plaintiff objects to this request as overly burdensome to the extent it
 2 purports to request documents that are, or should be, within the possession custody and control of
 3 one or more of the Defendants. Plaintiff objects to this request as overly burdensome to the extent
 4 it purports to duplicate or overlap in subject matter with other requests propounded by the
 5 Defendants.

6 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
 7 search, Plaintiff will produce responsive, non-privileged information within its custody and control
 8 to the extent that such information exists.

9
 10 **REQUEST NO. 86:**

11 Please produce each and every written or recorded statement, deposition transcript, affidavit,
 12 affirmation or declaration, or UEC Board Meeting Minutes Concerning the Special Investigation
 13 Committee that UEC, or anyone on its behalf has obtained.

14 **OBJECTIONS AND RESPONSE:**

15 Plaintiff incorporates each of its General Objections and Objections to Definitions and
 16 Instructions as if fully set forth herein.

17 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
 18 which are subject to more than one reasonable interpretation: "recorded statement." Plaintiff will
 19 undertake to interpret these terms as they would in ordinary usage given the context. Plaintiff
 20 objects to this request as overly broad and unduly burdensome inasmuch as it purports to request the
 21 production of "all" or "each and every" document in the requested category of documents. Such a
 22 request for all documents is unduly burdensome in particular given the extremely broad definitions
 23 of "Document" supplied by Defendants and, consequently, the request purports to require Plaintiff
 24 to collect documents from potentially every employee, agent or attorney of Plaintiff rather than
 25 conduct a reasonable investigation that collects responsive documents from a reasonable list of
 26 custodians whose job responsibilities would indicate that they were in possession of potentially
 27 responsive information. Plaintiff objects to this request to the extent it purports to request
 28 information that is neither relevant to the subject matter of this lawsuit nor reasonably calculated to

1 lead to the discovery of admissible evidence. Plaintiff objects to this request to the extent it
 2 purports to request information that is in the possession, custody or control of third parties to this
 3 lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff objects to this
 4 request to the extent that it is not reasonably limited to a time period relevant to the causes of action
 5 and claims at issue in this lawsuit. Plaintiff objects to this request to the extent that it purports to
 6 request information that is outside of the possession, custody or control of Plaintiff. Plaintiff
 7 objects to this request as overly burdensome to the extent it purports to request documents that are,
 8 or should be, within the possession custody and control of one or more of the Defendants.

9 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
 10 search, Plaintiff will produce responsive, non-privileged information within its custody and control
 11 to the extent that such information exists.

12
 13 **REQUEST NO. 87:**

14 Please produce all Documents Concerning communications between UEC and Mr. Yoshinao
 15 Negishi from January 1, 2017 to the present.

16 **OBJECTIONS AND RESPONSE:**

17 Plaintiff incorporates each of its General Objections and Objections to Definitions and
 18 Instructions as if fully set forth herein.

19 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
 20 which are subject to more than one reasonable interpretation: "all Documents Concerning" and
 21 "communications." Plaintiff will undertake to interpret these terms as they would in ordinary usage
 22 given the context. Plaintiff objects to this request as overly broad and unduly burdensome
 23 inasmuch as it purports to request the production of "all" or "each and every" document in the
 24 requested category of documents. Such a request for all documents is unduly burdensome in
 25 particular given the extremely broad definitions of "Document" supplied by Defendants and,
 26 consequently, the request purports to require Plaintiff to collect documents from potentially every
 27 employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects
 28 responsive documents from a reasonable list of custodians whose job responsibilities would indicate

1 that they were in possession of potentially responsive information. Plaintiff objects to this request
 2 to the extent it purports to request the production of information subject to the attorney-client
 3 privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff
 4 objects to this request to the extent it purports to request information that is neither relevant to the
 5 subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible
 6 evidence. Plaintiff objects to this request to the extent it purports to request information that is in
 7 the possession, custody or control of third parties to this lawsuit and not within the possession,
 8 custody and control of Plaintiff.

9 Plaintiff objects to this request to the extent that it purports to request information that is outside of
 10 the possession, custody or control of Plaintiff. Plaintiff objects to this request as overly
 11 burdensome to the extent it purports to request documents that are, or should be, within the
 12 possession custody and control of one or more of the Defendants.

13 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
 14 search, Plaintiff will produce responsive, non-privileged information within its custody and control
 15 to the extent that such information exists.

16
 17 **REQUEST NO. 88:**

18 Please produce all Documents Concerning communications between Mr. Fujimoto and Mr.
 19 Yoshinao Negishi from January 1, 2017 to the present.

20 **OBJECTIONS AND RESPONSE:**

21 Plaintiff incorporates each of its General Objections and Objections to Definitions and
 22 Instructions as if fully set forth herein.

23 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
 24 which are subject to more than one reasonable interpretation: "all Documents Concerning" and
 25 "communications." Plaintiff will undertake to interpret these terms as they would in ordinary usage
 26 given the context. Plaintiff objects to this request as overly broad and unduly burdensome
 27 inasmuch as it purports to request the production of "all" or "each and every" document in the
 28 requested category of documents. Such a request for all documents is unduly burdensome in

particular given the extremely broad definitions of “Document” supplied by Defendants and, consequently, the request purports to require Plaintiff to collect documents from potentially every employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a reasonable list of custodians whose job responsibilities would indicate that they were in possession of potentially responsive information. Plaintiff objects to this request to the extent it purports to request the production of information subject to the attorney-client privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff objects to this request to the extent it purports to request information that is neither relevant to the subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff objects to this request to the extent it purports to request information that is in the possession, custody or control of third parties to this lawsuit and not within the possession, custody and control of Plaintiff.

Plaintiff objects to this request to the extent that it purports to request information that is outside of the possession, custody or control of Plaintiff.

Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and search, Plaintiff will produce responsive, non-privileged information within its custody and control to the extent that such information exists.

REQUEST NO. 89:

Please produce all Documents Concerning communications between UEC and Ms. Joanna Ip from January 1, 2017 to the present.

OBJECTIONS AND RESPONSE:

Plaintiff incorporates each of its General Objections and Objections to Definitions and Instructions as if fully set forth herein.

Plaintiff objects to this request as vague and ambiguous in its use of the following terms, which are subject to more than one reasonable interpretation: “all Documents Concerning” and “communications.” Plaintiff will undertake to interpret these terms as they would in ordinary usage given the context. Plaintiff objects to this request as overly broad and unduly burdensome

inasmuch as it purports to request the production of “all” or “each and every” document in the requested category of documents. Such a request for all documents is unduly burdensome in particular given the extremely broad definitions of “Document” supplied by Defendants and, consequently, the request purports to require Plaintiff to collect documents from potentially every employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a reasonable list of custodians whose job responsibilities would indicate that they were in possession of potentially responsive information. Plaintiff objects to this request to the extent it purports to request the production of information subject to the attorney-client privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff objects to this request to the extent it purports to request information that is neither relevant to the subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff objects to this request to the extent it purports to request information that is in the possession, custody or control of third parties to this lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff objects to this request to the extent that it purports to request information that is outside of the possession, custody or control of Plaintiff.

Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and search, Plaintiff will produce responsive, non-privileged information within its custody and control to the extent that such information exists.

REQUEST NO. 90:

Please produce all Documents Concerning communications between UEC and Tiger Resorts Asia Limited from January 1, 2017 to the present Concerning the Special Investigation Committee report which is referenced in paragraph 68 of the Second Amended Complaint.

OBJECTIONS AND RESPONSE:

Plaintiff incorporates each of its General Objections and Objections to Definitions and Instructions as if fully set forth herein.

Plaintiff objects to this request as vague and ambiguous in its use of the following terms,

1 which are subject to more than one reasonable interpretation: “all Documents Concerning” and
2 “communications.” Plaintiff will undertake to interpret these terms as they would in ordinary usage
3 given the context. Plaintiff objects to this request as overly broad and unduly burdensome
4 inasmuch as it purports to request the production of “all” or “each and every” document in the
5 requested category of documents. Such a request for all documents is unduly burdensome in
6 particular given the extremely broad definitions of “Document” supplied by Defendants and,
7 consequently, the request purports to require Plaintiff to collect documents from potentially every
8 employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects
9 responsive documents from a reasonable list of custodians whose job responsibilities would indicate
10 that they were in possession of potentially responsive information. Plaintiff objects to this request
11 to the extent it purports to request the production of information subject to the attorney-client
12 privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff
13 objects to this request to the extent it purports to request information that is neither relevant to the
14 subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible
15 evidence. Plaintiff objects to this request to the extent it purports to request information that is in
16 the possession, custody or control of third parties to this lawsuit and not within the possession,
17 custody and control of Plaintiff.
18 Plaintiff objects to this request to the extent that it purports to request information that is outside of
19 the possession, custody or control of Plaintiff.

20 Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and
21 search, Plaintiff will produce responsive, non-privileged information within its custody and control
22 to the extent that such information exists.

23
24 **REQUEST NO. 91:**

25 Please produce all Documents from UEC’s Internal Audit Office from January 1, 2015 to present
26 Concerning any subject matters that are contained in the Special Investigation Committee report
27 which is referenced in paragraph 68 of the Second Amended Complaint.

28 **OBJECTIONS AND RESPONSE:**

1 Plaintiff incorporates each of its General Objections and Objections to Definitions and
2 Instructions as if fully set forth herein.

3 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
4 which are subject to more than one reasonable interpretation: “all Documents Concerning” and
5 “any subject matters.” Plaintiff will undertake to interpret these terms as they would in ordinary
6 usage given the context. Plaintiff objects to this request as overly broad and unduly burdensome
7 inasmuch as it purports to request the production of “all” or “each and every” document in the
8 requested category of documents. Such a request for all documents is unduly burdensome in
9 particular given the extremely broad definitions of “Document” supplied by Defendants and,
10 consequently, the request purports to require Plaintiff to collect documents from potentially every
11 employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects
12 responsive documents from a reasonable list of custodians whose job responsibilities would indicate
13 that they were in possession of potentially responsive information. Plaintiff objects to this request
14 to the extent it purports to request the production of information subject to the attorney-client
15 privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff
16 objects to this request to the extent it purports to request information that is neither relevant to the
17 subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible
18 evidence. Plaintiff objects to this request as overly burdensome to the extent it purports to request
19 documents that are, or should be, within the possession custody and control of one or more of the
20 Defendants. Plaintiff objects to this request as overly burdensome to the extent it purports to
21 duplicate or overlap in subject matter with other requests propounded by the Defendants.

22 Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and
23 search, Plaintiff will produce responsive, non-privileged information within its custody and control
24 to the extent that such information exists.

25
26 **REQUEST NO. 92:**

27 Please produce all Documents Concerning the selection of those persons who worked in UEC’s
28 Internal Audit Office as of May 23, 2017.

OBJECTIONS AND RESPONSE:

Plaintiff incorporates each of its General Objections and Objections to Definitions and Instructions as if fully set forth herein.

Plaintiff objects to this request as vague and ambiguous in its use of the following terms, which are subject to more than one reasonable interpretation: “all Documents Concerning.” Plaintiff will undertake to interpret these terms as they would in ordinary usage given the context. Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it purports to request the production of “all” or “each and every” document in the requested category of documents. Such a request for all documents is unduly burdensome in particular given the extremely broad definitions of “Document” supplied by Defendants and, consequently, the request purports to require Plaintiff to collect documents from potentially every employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a reasonable list of custodians whose job responsibilities would indicate that they were in possession of potentially responsive information. Plaintiff objects to this request to the extent it purports to request the production of information subject to the attorney-client privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff objects to this request to the extent it purports to request information that is neither relevant to the subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and search, Plaintiff will produce responsive, non-privileged information within its custody and control to the extent that such information exists.

REQUEST NO. 93:

Please produce all Documents from UEC’s Board of Corporate Auditors which approved the report made by Mr. Nobuyoshi Ichikura at UEC’s Extraordinary Board Meeting held on May 23, 2017.

OBJECTIONS AND RESPONSE:

Plaintiff incorporates each of its General Objections and Objections to Definitions and Instructions as if fully set forth herein.

1 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
2 which are subject to more than one reasonable interpretation: “all Documents.” Plaintiff will
3 undertake to interpret these terms as they would in ordinary usage given the context. Plaintiff
4 objects to this request as overly broad and unduly burdensome inasmuch as it purports to request the
5 production of “all” or “each and every” document in the requested category of documents. Such a
6 request for all documents is unduly burdensome in particular given the extremely broad definitions
7 of “Document” supplied by Defendants and, consequently, the request purports to require Plaintiff
8 to collect documents from potentially every employee, agent or attorney of Plaintiff rather than
9 conduct a reasonable investigation that collects responsive documents from a reasonable list of
10 custodians whose job responsibilities would indicate that they were in possession of potentially
11 responsive information. Plaintiff objects to this request to the extent it purports to request the
12 production of information subject to the attorney-client privilege, the work product doctrine or any
13 other recognized privilege or immunity. Plaintiff objects to this request to the extent it purports to
14 request information that is neither relevant to the subject matter of this lawsuit nor reasonably
15 calculated to lead to the discovery of admissible evidence. Plaintiff objects to this request as overly
16 burdensome to the extent it purports to request documents that are, or should be, within the
17 possession custody and control of one or more of the Defendants. Plaintiff objects to this request as
18 overly burdensome to the extent it purports to duplicate or overlap in subject matter with other
19 requests propounded by the Defendants.

20 Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and
21 search, Plaintiff will produce responsive, non-privileged information within its custody and control
22 to the extent that such information exists.

23
24 **REQUEST NO. 94:**

25 Please produce all Documents Concerning the selection of those persons who served on UEC’s
26 Board of Corporate Auditors on May 23, 2017.

27 **OBJECTIONS AND RESPONSE:**

28 Plaintiff incorporates each of its General Objections and Objections to Definitions and

1 Instructions as if fully set forth herein.

2 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
3 which are subject to more than one reasonable interpretation: “all Documents
4 Concerning.” Plaintiff will undertake to interpret these terms as they would in ordinary usage given
5 the context. Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it
6 purports to request the production of “all” or “each and every” document in the requested category
7 of documents. Such a request for all documents is unduly burdensome in particular given the
8 extremely broad definitions of “Document” supplied by Defendants and, consequently, the request
9 purports to require Plaintiff to collect documents from potentially every employee, agent or attorney
10 of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a
11 reasonable list of custodians whose job responsibilities would indicate that they were in possession
12 of potentially responsive information. Plaintiff objects to this request to the extent it purports to
13 request the production of information subject to the attorney-client privilege, the work product
14 doctrine or any other recognized privilege or immunity. Plaintiff objects to this request to the
15 extent it purports to request information that is neither relevant to the subject matter of this lawsuit
16 nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff objects to this
17 request as overly burdensome to the extent it purports to request documents that are, or should be,
18 within the possession custody and control of one or more of the Defendants. Plaintiff objects to this
19 request as overly burdensome to the extent it purports to duplicate or overlap in subject matter with
20 other requests propounded by the Defendants.

21 Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and
22 search, Plaintiff will produce responsive, non-privileged information within its custody and control
23 to the extent that such information exists.

24
25 **REQUEST NO. 95:**

26 Please produce all Documents Concerning communications between Mr. Fujimoto and Auditor
27 Nobuyoshi Ichikura (or Nobuyoshi Ichigura) from January 1, 2017 to the present Concerning
28 any subject matters that are contained in the Special Investigation Committee report

1 which is referenced in paragraph 68 of the Second Amended Complaint.

2 **OBJECTIONS AND RESPONSE:**

3 Plaintiff incorporates each of its General Objections and Objections to Definitions and
4 Instructions as if fully set forth herein.

5 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
6 which are subject to more than one reasonable interpretation: “all Documents Concerning,”
7 “communications” and “Concerning any subject matter.” Plaintiff will undertake to interpret these
8 terms as they would in ordinary usage given the context. Plaintiff objects to this request as overly
9 broad and unduly burdensome inasmuch as it purports to request the production of “all” or “each
10 and every” document in the requested category of documents. Such a request for all documents is
11 unduly burdensome in particular given the extremely broad definitions of “Document” supplied by
12 Defendants and, consequently, the request purports to require Plaintiff to collect documents from
13 potentially every employee, agent or attorney of Plaintiff rather than conduct a reasonable
14 investigation that collects responsive documents from a reasonable list of custodians whose job
15 responsibilities would indicate that they were in possession of potentially responsive
16 information. Plaintiff objects to this request to the extent it purports to request the production of
17 information subject to the attorney-client privilege, the work product doctrine or any other
18 recognized privilege or immunity. Plaintiff objects to this request to the extent it purports to
19 request information that is neither relevant to the subject matter of this lawsuit nor reasonably
20 calculated to lead to the discovery of admissible evidence. Plaintiff objects to this request to the
21 extent it purports to request information that is in the possession, custody or control of third parties
22 to this lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff objects to
23 this request to the extent that it purports to request information that is outside of the possession,
24 custody or control of Plaintiff. Plaintiff objects to this request as overly burdensome to the extent it
25 purports to duplicate or overlap in subject matter with other requests propounded by the Defendants.

26 Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and
27 search, Plaintiff will produce responsive, non-privileged information within its custody and control
28 to the extent that such information exists.

1 **REQUEST NO. 96:**

2 Please produce all Documents Concerning communications between UEC and the City-Yuwa
3 Partners law firm from January 1, 2015 to the present.

4 **OBJECTIONS AND RESPONSE:**

5 Plaintiff incorporates each of its General Objections and Objections to Definitions and
6 Instructions as if fully set forth herein.

7 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
8 which are subject to more than one reasonable interpretation: “all Documents Concerning” and
9 “communications.” Plaintiff will undertake to interpret these terms as they would in ordinary usage
10 given the context. Plaintiff objects to this request as overly broad and unduly burdensome
11 inasmuch as it purports to request the production of “all” or “each and every” document in the
12 requested category of documents. Such a request for all documents is unduly burdensome in
13 particular given the extremely broad definitions of “Document” supplied by Defendants and,
14 consequently, the request purports to require Plaintiff to collect documents from potentially every
15 employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects
16 responsive documents from a reasonable list of custodians whose job responsibilities would indicate
17 that they were in possession of potentially responsive information. Plaintiff objects to this request
18 to the extent it purports to request the production of information subject to the attorney-client
19 privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff
20 objects to this request to the extent it purports to request information that is neither relevant to the
21 subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible
22 evidence. Plaintiff objects to this request to the extent it purports to request information that is in
23 the possession, custody or control of third parties to this lawsuit and not within the possession,
24 custody and control of Plaintiff.

25 Plaintiff objects to this request to the extent that it purports to request information that is outside of
26 the possession, custody or control of Plaintiff.

27 Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and
28 search, Plaintiff will produce responsive, non-privileged information within its custody and control

1 to the extent that such information exists.

2
3 **REQUEST NO. 97:**

4 Please produce all Documents Concerning communications between Mr. Fujimoto and the Special
5 Investigation Committee from January 1, 2017 to the present.

6 **OBJECTIONS AND RESPONSE:**

7 Plaintiff incorporates each of its General Objections and Objections to Definitions and
8 Instructions as if fully set forth herein.

9 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
10 which are subject to more than one reasonable interpretation: “all Documents Concerning” and
11 “communications.” Plaintiff will undertake to interpret these terms as they would in ordinary usage
12 given the context. Plaintiff objects to this request as overly broad and unduly burdensome
13 inasmuch as it purports to request the production of “all” or “each and every” document in the
14 requested category of documents. Such a request for all documents is unduly burdensome in
15 particular given the extremely broad definitions of “Document” supplied by Defendants and,
16 consequently, the request purports to require Plaintiff to collect documents from potentially every
17 employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects
18 responsive documents from a reasonable list of custodians whose job responsibilities would indicate
19 that they were in possession of potentially responsive information. Plaintiff objects to this request
20 to the extent it purports to request the production of information subject to the attorney-client
21 privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff
22 objects to this request to the extent it purports to request information that is neither relevant to the
23 subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible
24 evidence. Plaintiff objects to this request to the extent it purports to request information that is in
25 the possession, custody or control of third parties to this lawsuit and not within the possession,
26 custody and control of Plaintiff.
27 Plaintiff objects to this request as overly burdensome to the extent it purports to duplicate or overlap
28 in subject matter with other requests propounded by the Defendants.

1 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
2 search, Plaintiff will produce responsive, non-privileged information within its custody and control
3 to the extent that such information exists.

4
5 **REQUEST NO. 98:**

6 Please produce all Documents Concerning communications between UEC and Mr. Michio
7 Masaki from January 1, 2017 to the present.

8 **OBJECTIONS AND RESPONSE:**

9 Plaintiff incorporates each of its General Objections and Objections to Definitions and
10 Instructions as if fully set forth herein.

11 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
12 which are subject to more than one reasonable interpretation: "all Documents Concerning" and
13 "communications." Plaintiff will undertake to interpret these terms as they would in ordinary usage
14 given the context. Plaintiff objects to this request as overly broad and unduly burdensome
15 inasmuch as it purports to request the production of "all" or "each and every" document in the
16 requested category of documents. Such a request for all documents is unduly burdensome in
17 particular given the extremely broad definitions of "Document" supplied by Defendants and,
18 consequently, the request purports to require Plaintiff to collect documents from potentially every
19 employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects
20 responsive documents from a reasonable list of custodians whose job responsibilities would indicate
21 that they were in possession of potentially responsive information. Plaintiff objects to this request
22 to the extent it purports to request the production of information subject to the attorney-client
23 privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff
24 objects to this request to the extent it purports to request information that is neither relevant to the
25 subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible
26 evidence. Plaintiff objects to this request to the extent it purports to request information that is in
27 the possession, custody or control of third parties to this lawsuit and not within the possession,
28 custody and control of Plaintiff.

1 Plaintiff objects to this request to the extent that it purports to request information that is outside of
2 the possession, custody or control of Plaintiff.

3 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
4 search, Plaintiff will produce responsive, non-privileged information within its custody and control
5 to the extent that such information exists.

6
7 **REQUEST NO. 99:**

8 Please produce all Documents Concerning communications between UEC and Mr. Sotaro
9 Matsuo from January 1, 2017 to the present.

10 **OBJECTIONS AND RESPONSE:**

11 Plaintiff incorporates each of its General Objections and Objections to Definitions and
12 Instructions as if fully set forth herein.

13 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
14 which are subject to more than one reasonable interpretation: "all Documents Concerning" and
15 "communications." Plaintiff will undertake to interpret these terms as they would in ordinary usage
16 given the context. Plaintiff objects to this request as overly broad and unduly burdensome
17 inasmuch as it purports to request the production of "all" or "each and every" document in the
18 requested category of documents. Such a request for all documents is unduly burdensome in
19 particular given the extremely broad definitions of "Document" supplied by Defendants and,
20 consequently, the request purports to require Plaintiff to collect documents from potentially every
21 employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects
22 responsive documents from a reasonable list of custodians whose job responsibilities would indicate
23 that they were in possession of potentially responsive information. Plaintiff objects to this request
24 to the extent it purports to request the production of information subject to the attorney-client
25 privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff
26 objects to this request to the extent it purports to request information that is neither relevant to the
27 subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible
28 evidence. Plaintiff objects to this request to the extent it purports to request information that is in

1 the possession, custody or control of third parties to this lawsuit and not within the possession,
2 custody and control of Plaintiff.

3 Plaintiff objects to this request to the extent that it purports to request information that is outside of
4 the possession, custody or control of Plaintiff.

5 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
6 search, Plaintiff will produce responsive, non-privileged information within its custody and control
7 to the extent that such information exists.

8
9 **REQUEST NO. 100:**

10 Please produce all Documents Concerning communications between UEC and Mr. Miya Fukayama
11 from January 1, 2017 to the present.

12 **OBJECTIONS AND RESPONSE:**

13 Plaintiff incorporates each of its General Objections and Objections to Definitions and
14 Instructions as if fully set forth herein.

15 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
16 which are subject to more than one reasonable interpretation: "all Documents Concerning" and
17 "communications." Plaintiff will undertake to interpret these terms as they would in ordinary usage
18 given the context. Plaintiff objects to this request as overly broad and unduly burdensome
19 inasmuch as it purports to request the production of "all" or "each and every" document in the
20 requested category of documents. Such a request for all documents is unduly burdensome in
21 particular given the extremely broad definitions of "Document" supplied by Defendants and,
22 consequently, the request purports to require Plaintiff to collect documents from potentially every
23 employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects
24 responsive documents from a reasonable list of custodians whose job responsibilities would indicate
25 that they were in possession of potentially responsive information. Plaintiff objects to this request
26 to the extent it purports to request the production of information subject to the attorney-client
27 privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff
28 objects to this request to the extent it purports to request information that is neither relevant to the

1 subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible
2 evidence. Plaintiff objects to this request to the extent it purports to request information that is in
3 the possession, custody or control of third parties to this lawsuit and not within the possession,
4 custody and control of Plaintiff.

5 Plaintiff objects to this request to the extent that it purports to request information that is outside of
6 the possession, custody or control of Plaintiff.

7 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
8 search, Plaintiff will produce responsive, non-privileged information within its custody and control
9 to the extent that such information exists.

10
11 **REQUEST NO. 101:**

12 Please produce all Documents Concerning communications between UEC and Mr. Takahiro
13 Usui from January 1, 2017 to the present.

14 **OBJECTIONS AND RESPONSE:**

15 Plaintiff incorporates each of its General Objections and Objections to Definitions and
16 Instructions as if fully set forth herein.

17 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
18 which are subject to more than one reasonable interpretation: "all Documents Concerning" and
19 "communications." Plaintiff will undertake to interpret these terms as they would in ordinary usage
20 given the context. Plaintiff objects to this request as overly broad and unduly burdensome
21 inasmuch as it purports to request the production of "all" or "each and every" document in the
22 requested category of documents. Such a request for all documents is unduly burdensome in
23 particular given the extremely broad definitions of "Document" supplied by Defendants and,
24 consequently, the request purports to require Plaintiff to collect documents from potentially every
25 employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects
26 responsive documents from a reasonable list of custodians whose job responsibilities would indicate
27 that they were in possession of potentially responsive information. Plaintiff objects to this request
28 to the extent it purports to request the production of information subject to the attorney-client

1 privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff
 2 objects to this request to the extent it purports to request information that is neither relevant to the
 3 subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible
 4 evidence. Plaintiff objects to this request to the extent it purports to request information that is in
 5 the possession, custody or control of third parties to this lawsuit and not within the possession,
 6 custody and control of Plaintiff.
 7 Plaintiff objects to this request to the extent that it purports to request information that is outside of
 8 the possession, custody or control of Plaintiff.

9 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
 10 search, Plaintiff will produce responsive, non-privileged information within its custody and control
 11 to the extent that such information exists.

12
 13 **REQUEST NO. 102:**

14 Please produce all Documents Concerning communications between Mr. Fujimoto and Ms. Takako
 15 Okada from January 1, 2017 to the present.

16 **OBJECTIONS AND RESPONSE:**

17 Plaintiff incorporates each of its General Objections and Objections to Definitions and
 18 Instructions as if fully set forth herein.

19 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
 20 which are subject to more than one reasonable interpretation: "all Documents Concerning" and
 21 "communications." Plaintiff will undertake to interpret these terms as they would in ordinary usage
 22 given the context. Plaintiff objects to this request as overly broad and unduly burdensome
 23 inasmuch as it purports to request the production of "all" or "each and every" document in the
 24 requested category of documents. Such a request for all documents is unduly burdensome in
 25 particular given the extremely broad definitions of "Document" supplied by Defendants and,
 26 consequently, the request purports to require Plaintiff to collect documents from potentially every
 27 employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects
 28 responsive documents from a reasonable list of custodians whose job responsibilities would indicate

1 that they were in possession of potentially responsive information. Plaintiff objects to this request
2 to the extent it purports to request the production of information subject to the attorney-client
3 privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff
4 objects to this request to the extent it purports to request information that is neither relevant to the
5 subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible
6 evidence. Plaintiff objects to this request to the extent it purports to request information that is in
7 the possession, custody or control of third parties to this lawsuit and not within the possession,
8 custody and control of Plaintiff.

9 Plaintiff objects to this request to the extent that it purports to request information that is outside of
10 the possession, custody or control of Plaintiff.

11 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
12 search, Plaintiff will produce responsive, non-privileged information within its custody and control
13 to the extent that such information exists.

14
15 **REQUEST NO. 103:**

16 Please produce all Documents Concerning communications between Mr. Fujimoto and Mr. Kenshi
17 Asano from January 1, 2017 to the present Concerning the Special Investigation Committee, Okada
18 Holdings or Mr. Kazuo Okada.

19 **OBJECTIONS AND RESPONSE:**

20 Plaintiff incorporates each of its General Objections and Objections to Definitions and
21 Instructions as if fully set forth herein.

22 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
23 which are subject to more than one reasonable interpretation: "all Documents Concerning" and
24 "communications." Plaintiff will undertake to interpret these terms as they would in ordinary usage
25 given the context. Plaintiff objects to this request as overly broad and unduly burdensome
26 inasmuch as it purports to request the production of "all" or "each and every" document in the
27 requested category of documents. Such a request for all documents is unduly burdensome in
28 particular given the extremely broad definitions of "Document" supplied by Defendants and,

1 consequently, the request purports to require Plaintiff to collect documents from potentially every
2 employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects
3 responsive documents from a reasonable list of custodians whose job responsibilities would indicate
4 that they were in possession of potentially responsive information. Plaintiff objects to this request
5 to the extent it purports to request the production of information subject to the attorney-client
6 privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff
7 objects to this request to the extent it purports to request information that is neither relevant to the
8 subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible
9 evidence. Plaintiff objects to this request to the extent it purports to request information that is in
10 the possession, custody or control of third parties to this lawsuit and not within the possession,
11 custody and control of Plaintiff.

12 Plaintiff objects to this request to the extent that it purports to request information that is outside of
13 the possession, custody or control of Plaintiff.

14 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
15 search, Plaintiff will produce responsive, non-privileged information within its custody and control
16 to the extent that such information exists.

17
18 **REQUEST NO. 104:**

19 Please produce all Documents Concerning communications between Mr. Fujimoto and Ms. Takako
20 Okada (and/or Ms. Sachiko Okada) from January 1, 2017 to the present Concerning the Special
21 Investigation Committee, Okada Holdings or Mr. Okada.

22 **OBJECTIONS AND RESPONSE:**

23 Plaintiff incorporates each of its General Objections and Objections to Definitions and
24 Instructions as if fully set forth herein.

25 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
26 which are subject to more than one reasonable interpretation: "all Documents Concerning" and
27 "communications." Plaintiff will undertake to interpret these terms as they would in ordinary usage
28 given the context. Plaintiff objects to this request as overly broad and unduly burdensome

1 inasmuch as it purports to request the production of “all” or “each and every” document in the
2 requested category of documents. Such a request for all documents is unduly burdensome in
3 particular given the extremely broad definitions of “Document” supplied by Defendants and,
4 consequently, the request purports to require Plaintiff to collect documents from potentially every
5 employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects
6 responsive documents from a reasonable list of custodians whose job responsibilities would indicate
7 that they were in possession of potentially responsive information. Plaintiff objects to this request
8 to the extent it purports to request the production of information subject to the attorney-client
9 privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff
10 objects to this request to the extent it purports to request information that is neither relevant to the
11 subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible
12 evidence. Plaintiff objects to this request to the extent it purports to request information that is in
13 the possession, custody or control of third parties to this lawsuit and not within the possession,
14 custody and control of Plaintiff.
15 Plaintiff objects to this request to the extent that it purports to request information that is outside of
16 the possession, custody or control of Plaintiff.

17 Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and
18 search, Plaintiff will produce responsive, non-privileged information within its custody and control
19 to the extent that such information exists.

20
21 **REQUEST NO. 105:**

22 Please produce all Documents Concerning communications between Mr. Fujimoto and Mr. Hajime
23 Tokuda from January 1, 2017 to the present Concerning the Special Investigation Committee,
24 Okada Holdings or Mr. Okada.

25 **OBJECTIONS AND RESPONSE:**

26 Plaintiff incorporates each of its General Objections and Objections to Definitions and
27 Instructions as if fully set forth herein.

28 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,

1 which are subject to more than one reasonable interpretation: “all Documents Concerning” and
2 “communications.” Plaintiff will undertake to interpret these terms as they would in ordinary usage
3 given the context. Plaintiff objects to this request as overly broad and unduly burdensome
4 inasmuch as it purports to request the production of “all” or “each and every” document in the
5 requested category of documents. Such a request for all documents is unduly burdensome in
6 particular given the extremely broad definitions of “Document” supplied by Defendants and,
7 consequently, the request purports to require Plaintiff to collect documents from potentially every
8 employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects
9 responsive documents from a reasonable list of custodians whose job responsibilities would indicate
10 that they were in possession of potentially responsive information. Plaintiff objects to this request
11 to the extent it purports to request the production of information subject to the attorney-client
12 privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff
13 objects to this request to the extent it purports to request information that is neither relevant to the
14 subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible
15 evidence. Plaintiff objects to this request to the extent it purports to request information that is in
16 the possession, custody or control of third parties to this lawsuit and not within the possession,
17 custody and control of Plaintiff.
18 Plaintiff objects to this request to the extent that it purports to request information that is outside of
19 the possession, custody or control of Plaintiff.

20 Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and
21 search, Plaintiff will produce responsive, non-privileged information within its custody and control
22 to the extent that such information exists.

23
24 **REQUEST NO. 106:**

25 Please produce all Documents Concerning communications between Mr. Fujimoto and Mr.
26 Masayoshi Miyayaga from January 1, 2017 to the present Concerning the Special Investigation
27 Committee, Okada Holdings or Mr. Okada.

28 //

OBJECTIONS AND RESPONSE:

Plaintiff incorporates each of its General Objections and Objections to Definitions and Instructions as if fully set forth herein.

Plaintiff objects to this request as vague and ambiguous in its use of the following terms, which are subject to more than one reasonable interpretation: “all Documents Concerning” and “communications.” Plaintiff will undertake to interpret these terms as they would in ordinary usage given the context. Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it purports to request the production of “all” or “each and every” document in the requested category of documents. Such a request for all documents is unduly burdensome in particular given the extremely broad definitions of “Document” supplied by Defendants and, consequently, the request purports to require Plaintiff to collect documents from potentially every employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a reasonable list of custodians whose job responsibilities would indicate that they were in possession of potentially responsive information. Plaintiff objects to this request to the extent it purports to request the production of information subject to the attorney-client privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff objects to this request to the extent it purports to request information that is neither relevant to the subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff objects to this request to the extent it purports to request information that is in the possession, custody or control of third parties to this lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff objects to this request to the extent that it purports to request information that is outside of the possession, custody or control of Plaintiff.

Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and search, Plaintiff will produce responsive, non-privileged information within its custody and control to the extent that such information exists.

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REQUEST NO. 107:

Please produce all Documents Concerning communications between Mr. Fujimoto and Mr. Seisui Kamigaki from January 1, 2017 to the present Concerning the Special Investigation Committee, Okada Holdings or Mr. Okada.

OBJECTIONS AND RESPONSE:

Plaintiff incorporates each of its General Objections and Objections to Definitions and Instructions as if fully set forth herein.

Plaintiff objects to this request as vague and ambiguous in its use of the following terms, which are subject to more than one reasonable interpretation: “all Documents Concerning” and “communications.” Plaintiff will undertake to interpret these terms as they would in ordinary usage given the context. Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it purports to request the production of “all” or “each and every” document in the requested category of documents. Such a request for all documents is unduly burdensome in particular given the extremely broad definitions of “Document” supplied by Defendants and, consequently, the request purports to require Plaintiff to collect documents from potentially every employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a reasonable list of custodians whose job responsibilities would indicate that they were in possession of potentially responsive information. Plaintiff objects to this request to the extent it purports to request the production of information subject to the attorney-client privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff objects to this request to the extent it purports to request information that is neither relevant to the subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff objects to this request to the extent it purports to request information that is in the possession, custody or control of third parties to this lawsuit and not within the possession, custody and control of Plaintiff.

Plaintiff objects to this request to the extent that it purports to request information that is outside of the possession, custody or control of Plaintiff.

Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and

1 search, Plaintiff will produce responsive, non-privileged information within its custody and control
2 to the extent that such information exists.

3
4 **REQUEST NO. 108:**

5 Please produce all Documents Concerning communications between Mr. Fujimoto and Mr. Yoshio
6 Otani from January 1, 2017 to the present Concerning the Special Investigation Committee, Okada
7 Holdings or Mr. Okada.

8 **OBJECTIONS AND RESPONSE:**

9 Plaintiff incorporates each of its General Objections and Objections to Definitions and
10 Instructions as if fully set forth herein.

11 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
12 which are subject to more than one reasonable interpretation: “all Documents Concerning” and
13 “communications.” Plaintiff will undertake to interpret these terms as they would in ordinary usage
14 given the context. Plaintiff objects to this request as overly broad and unduly burdensome
15 inasmuch as it purports to request the production of “all” or “each and every” document in the
16 requested category of documents. Such a request for all documents is unduly burdensome in
17 particular given the extremely broad definitions of “Document” supplied by Defendants and,
18 consequently, the request purports to require Plaintiff to collect documents from potentially every
19 employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects
20 responsive documents from a reasonable list of custodians whose job responsibilities would indicate
21 that they were in possession of potentially responsive information. Plaintiff objects to this request
22 to the extent it purports to request the production of information subject to the attorney-client
23 privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff
24 objects to this request to the extent it purports to request information that is neither relevant to the
25 subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible
26 evidence. Plaintiff objects to this request to the extent it purports to request information that is in
27 the possession, custody or control of third parties to this lawsuit and not within the possession,
28 custody and control of Plaintiff.

1 Plaintiff objects to this request to the extent that it purports to request information that is outside of
2 the possession, custody or control of Plaintiff.

3 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
4 search, Plaintiff will produce responsive, non-privileged information within its custody and control
5 to the extent that such information exists.

6
7 **REQUEST NO. 109:**

8 Please produce all Documents Concerning communications between UEC and Deutsche Bank from
9 January 1, 2017 to the present Concerning the Special Investigation Committee, Okada Holdings or
10 Mr. Okada.

11 **OBJECTIONS AND RESPONSE:**

12 Plaintiff incorporates each of its General Objections and Objections to Definitions and
13 Instructions as if fully set forth herein.

14 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
15 which are subject to more than one reasonable interpretation: "all Documents Concerning" and
16 "communications." Plaintiff will undertake to interpret these terms as they would in ordinary usage
17 given the context. Plaintiff objects to this request as overly broad and unduly burdensome
18 inasmuch as it purports to request the production of "all" or "each and every" document in the
19 requested category of documents. Such a request for all documents is unduly burdensome in
20 particular given the extremely broad definitions of "Document" supplied by Defendants and,
21 consequently, the request purports to require Plaintiff to collect documents from potentially every
22 employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects
23 responsive documents from a reasonable list of custodians whose job responsibilities would indicate
24 that they were in possession of potentially responsive information. Plaintiff objects to this request
25 to the extent it purports to request the production of information subject to the attorney-client
26 privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff
27 objects to this request to the extent it purports to request information that is neither relevant to the
28 subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible

1 evidence. Plaintiff objects to this request to the extent it purports to request information that is in
2 the possession, custody or control of third parties to this lawsuit and not within the possession,
3 custody and control of Plaintiff.

4 Plaintiff objects to this request to the extent that it purports to request information that is outside of
5 the possession, custody or control of Plaintiff.

6 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
7 search, Plaintiff will produce responsive, non-privileged information within its custody and control
8 to the extent that such information exists.

9
10 **REQUEST NO. 110:**

11 Please produce all cellular telephone records for Mr. Fujimoto from January 1, 2017 to the present.

12 **OBJECTIONS AND RESPONSE:**

13 Plaintiff incorporates each of its General Objections and Objections to Definitions and
14 Instructions as if fully set forth herein.

15 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
16 which are subject to more than one reasonable interpretation: "all cellular telephone
17 records." Plaintiff will undertake to interpret these terms as they would in ordinary usage given the
18 context. Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it
19 purports to request the production of "all" or "each and every" document in the requested category
20 of documents. Such a request for all documents is unduly burdensome in particular given the
21 extremely broad definitions of "Document" supplied by Defendants and, consequently, the request
22 purports to require Plaintiff to collect documents from potentially every employee, agent or attorney
23 of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a
24 reasonable list of custodians whose job responsibilities would indicate that they were in possession
25 of potentially responsive information. Plaintiff objects to this request to the extent it purports to
26 request the production of information subject to the attorney-client privilege, the work product
27 doctrine or any other recognized privilege or immunity. Plaintiff objects to this request to the
28 extent it purports to request information that is neither relevant to the subject matter of this lawsuit

nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff objects to this request to the extent it purports to request information that is in the possession, custody or control of third parties to this lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff objects to this request to the extent that it purports to request information that is outside of the possession, custody or control of Plaintiff.

Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and search, Plaintiff will produce responsive, non-privileged information within its custody and control to the extent that such information exists.

REQUEST NO. 111:

Please produce all Documents Concerning plans by UEC to pursue an Initial Public Offering of its casino resort business in the Philippines.

OBJECTIONS AND RESPONSE:

Plaintiff incorporates each of its General Objections and Objections to Definitions and Instructions as if fully set forth herein.

Plaintiff objects to this request as vague and ambiguous in its use of the following terms, which are subject to more than one reasonable interpretation: "all Documents Concerning" and "communications." Plaintiff will undertake to interpret these terms as they would in ordinary usage given the context. Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it purports to request the production of "all" or "each and every" document in the requested category of documents. Such a request for all documents is unduly burdensome in particular given the extremely broad definitions of "Document" supplied by Defendants and, consequently, the request purports to require Plaintiff to collect documents from potentially every employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a reasonable list of custodians whose job responsibilities would indicate that they were in possession of potentially responsive information. Plaintiff objects to this request to the extent it purports to request the production of information subject to the attorney-client privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff

1 objects to this request to the extent it purports to request information that is neither relevant to the
 2 subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible
 3 evidence. Plaintiff objects to this request to the extent it purports to request information that is in
 4 the possession, custody or control of third parties to this lawsuit and not within the possession,
 5 custody and control of Plaintiff.
 6 Plaintiff objects to this request to the extent that it purports to request information that is outside of
 7 the possession, custody or control of Plaintiff. Plaintiff objects to this request to the extent that it is
 8 not reasonably limited to a time period relevant to the causes of action and claims at issue in this
 9 lawsuit.

10 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
 11 search, Plaintiff will produce responsive, non-privileged information within its custody and control
 12 to the extent that such information exists.

13 *Okada Holdings Takeover*

14 **REQUEST NO. 112:**

15 Please produce each and every written or recorded statement, deposition transcript, affidavit,
 16 affirmation or declaration Concerning Okada Holdings, from the period of January 1, 2015 to
 17 present, that UEC, or anyone on its behalf, has obtained.

18 **OBJECTIONS AND RESPONSE:**

19 Plaintiff incorporates each of its General Objections and Objections to Definitions and
 20 Instructions as if fully set forth herein.

21 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
 22 which are subject to more than one reasonable interpretation: "recorded statement." Plaintiff will
 23 undertake to interpret these terms as they would in ordinary usage given the context. Plaintiff
 24 objects to this request as overly broad and unduly burdensome inasmuch as it purports to request the
 25 production of "all" or "each and every" document in the requested category of documents. Such a
 26 request for all documents is unduly burdensome in particular given the extremely broad definitions
 27 of "Document" supplied by Defendants and, consequently, the request purports to require Plaintiff
 28

1 to collect documents from potentially every employee, agent or attorney of Plaintiff rather than
2 conduct a reasonable investigation that collects responsive documents from a reasonable list of
3 custodians whose job responsibilities would indicate that they were in possession of potentially
4 responsive information. Plaintiff objects to this request to the extent it purports to request the
5 production of information subject to the attorney-client privilege, the work product doctrine or any
6 other recognized privilege or immunity. Plaintiff objects to this request to the extent it purports to
7 request information that is neither relevant to the subject matter of this lawsuit nor reasonably
8 calculated to lead to the discovery of admissible evidence. Plaintiff objects to this request to the
9 extent it purports to request information that is in the possession, custody or control of third parties
10 to this lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff objects to
11 this request to the extent that it purports to request information that is outside of the possession,
12 custody or control of Plaintiff.

13 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
14 search, Plaintiff will produce responsive, non-privileged information within its custody and control
15 to the extent that such information exists.

16
17 **REQUEST NO. 113:**

18 Please produce all Documents Concerning communications between UEC and Mr. Tomohiro
19 Okada including, but not limited to those Documents, Concerning the Okada Holdings
20 Takeover or any activities of Mr. Okada.

21 **OBJECTIONS AND RESPONSE:**

22 Plaintiff incorporates each of its General Objections and Objections to Definitions and
23 Instructions as if fully set forth herein.

24 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
25 which are subject to more than one reasonable interpretation: "all Documents Concerning" and
26 "communications." Plaintiff will undertake to interpret these terms as they would in ordinary usage
27 given the context. Plaintiff objects to this request as overly broad and unduly burdensome
28 inasmuch as it purports to request the production of "all" or "each and every" document in the

1 requested category of documents. Such a request for all documents is unduly burdensome in
2 particular given the extremely broad definitions of “Document” supplied by Defendants and,
3 consequently, the request purports to require Plaintiff to collect documents from potentially every
4 employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects
5 responsive documents from a reasonable list of custodians whose job responsibilities would indicate
6 that they were in possession of potentially responsive information. Plaintiff objects to this request
7 to the extent it purports to request the production of information subject to the attorney-client
8 privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff
9 objects to this request to the extent it purports to request information that is neither relevant to the
10 subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible
11 evidence. Plaintiff objects to this request to the extent it purports to request information that is in
12 the possession, custody or control of third parties to this lawsuit and not within the possession,
13 custody and control of Plaintiff.

14 Plaintiff objects to this request to the extent that it purports to request information that is outside of
15 the possession, custody or control of Plaintiff.

16 Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and
17 search, Plaintiff will produce responsive, non-privileged information within its custody and control
18 to the extent that such information exists.

19
20 **REQUEST NO. 114:**

21 Please produce all Documents Concerning communications between Mr. Fujimoto and Mr.
22 Tomohiro Okada including, but not limited to those Documents, Concerning the Okada
23 Holdings Takeover or any activities of Mr. Okada.

24 **OBJECTIONS AND RESPONSE:**

25 Plaintiff incorporates each of its General Objections and Objections to Definitions and
26 Instructions as if fully set forth herein.

27 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
28 which are subject to more than one reasonable interpretation: “all Documents Concerning” and

1 “communications.” Plaintiff will undertake to interpret these terms as they would in ordinary usage
2 given the context. Plaintiff objects to this request as overly broad and unduly burdensome
3 inasmuch as it purports to request the production of “all” or “each and every” document in the
4 requested category of documents. Such a request for all documents is unduly burdensome in
5 particular given the extremely broad definitions of “Document” supplied by Defendants and,
6 consequently, the request purports to require Plaintiff to collect documents from potentially every
7 employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects
8 responsive documents from a reasonable list of custodians whose job responsibilities would indicate
9 that they were in possession of potentially responsive information. Plaintiff objects to this request
10 to the extent it purports to request the production of information subject to the attorney-client
11 privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff
12 objects to this request to the extent it purports to request information that is neither relevant to the
13 subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible
14 evidence. Plaintiff objects to this request to the extent it purports to request information that is in
15 the possession, custody or control of third parties to this lawsuit and not within the possession,
16 custody and control of Plaintiff.
17 Plaintiff objects to this request to the extent that it purports to request information that is outside of
18 the possession, custody or control of Plaintiff.

19 Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and
20 search, Plaintiff will produce responsive, non-privileged information within its custody and control
21 to the extent that such information exists.

22
23 **REQUEST NO. 115:**

24 Please produce all Documents Concerning communications between UEC and Mr. Makoto
25 Takada including, but not limited to, those Documents Concerning the Okada Holdings Takeover.

26 **OBJECTIONS AND RESPONSE:**

27 Plaintiff incorporates each of its General Objections and Objections to Definitions and
28 Instructions as if fully set forth herein.

1 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
2 which are subject to more than one reasonable interpretation: “all Documents Concerning” and
3 “communications.” Plaintiff will undertake to interpret these terms as they would in ordinary
4 usage given the context. Plaintiff objects to this request as overly broad and unduly burdensome
5 inasmuch as it purports to request the production of “all” or “each and every” document in the
6 requested category of documents. Such a request for all documents is unduly burdensome in
7 particular given the extremely broad definitions of “Document” supplied by Defendants and,
8 consequently, the request purports to require Plaintiff to collect documents from potentially every
9 employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects
10 responsive documents from a reasonable list of custodians whose job responsibilities would indicate
11 that they were in possession of potentially responsive information. Plaintiff objects to this request
12 to the extent it purports to request the production of information subject to the attorney-client
13 privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff
14 objects to this request to the extent it purports to request information that is neither relevant to the
15 subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible
16 evidence. Plaintiff objects to this request to the extent it purports to request information that is in
17 the possession, custody or control of third parties to this lawsuit and not within the possession,
18 custody and control of Plaintiff.
19 Plaintiff objects to this request to the extent that it purports to request information that is outside of
20 the possession, custody or control of Plaintiff.

21 Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and
22 search, Plaintiff will produce responsive, non-privileged information within its custody and control
23 to the extent that such information exists.

24
25 **REQUEST NO. 116:**

26 Please produce all Documents Concerning communications between Mr. Fujimoto and Mr. Makoto
27 Takada from January 1, 2017 to the present including, but not limited to, those Documents
28 Concerning the Okada Holdings Takeover.

OBJECTIONS AND RESPONSE:

Plaintiff incorporates each of its General Objections and Objections to Definitions and Instructions as if fully set forth herein.

Plaintiff objects to this request as vague and ambiguous in its use of the following terms, which are subject to more than one reasonable interpretation: “all Documents Concerning” and “communications.” Plaintiff will undertake to interpret these terms as they would in ordinary usage given the context. Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it purports to request the production of “all” or “each and every” document in the requested category of documents. Such a request for all documents is unduly burdensome in particular given the extremely broad definitions of “Document” supplied by Defendants and, consequently, the request purports to require Plaintiff to collect documents from potentially every employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a reasonable list of custodians whose job responsibilities would indicate that they were in possession of potentially responsive information. Plaintiff objects to this request to the extent it purports to request the production of information subject to the attorney-client privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff objects to this request to the extent it purports to request information that is neither relevant to the subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff objects to this request to the extent it purports to request information that is in the possession, custody or control of third parties to this lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff objects to this request to the extent that it purports to request information that is outside of the possession, custody or control of Plaintiff.

Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and search, Plaintiff will produce responsive, non-privileged information within its custody and control to the extent that such information exists.

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1 **REQUEST NO. 117:**

2 Please produce all Documents Concerning communications between UEC and Mr. Atsunobu Ishida,
3 including, but not limited to, those Documents Concerning the Okada Holdings Takeover.

4 **OBJECTIONS AND RESPONSE:**

5 Plaintiff incorporates each of its General Objections and Objections to Definitions and
6 Instructions as if fully set forth herein.

7 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
8 which are subject to more than one reasonable interpretation: “all Documents Concerning” and
9 “communications.” Plaintiff will undertake to interpret these terms as they would in ordinary usage
10 given the context. Plaintiff objects to this request as overly broad and unduly burdensome
11 inasmuch as it purports to request the production of “all” or “each and every” document in the
12 requested category of documents. Such a request for all documents is unduly burdensome in
13 particular given the extremely broad definitions of “Document” supplied by Defendants and,
14 consequently, the request purports to require Plaintiff to collect documents from potentially every
15 employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects
16 responsive documents from a reasonable list of custodians whose job responsibilities would indicate
17 that they were in possession of potentially responsive information. Plaintiff objects to this request
18 to the extent it purports to request the production of information subject to the attorney-client
19 privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff
20 objects to this request to the extent it purports to request information that is neither relevant to the
21 subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible
22 evidence. Plaintiff objects to this request to the extent it purports to request information that is in
23 the possession, custody or control of third parties to this lawsuit and not within the possession,
24 custody and control of Plaintiff.

25 Plaintiff objects to this request to the extent that it purports to request information that is outside of
26 the possession, custody or control of Plaintiff.

27 Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and
28 search, Plaintiff will produce responsive, non-privileged information within its custody and control

1 to the extent that such information exists.

2
3 **REQUEST NO. 118:**

4 Please produce all Documents Concerning communications between Mr. Fujimoto and Mr.
5 Atsunobu Ishida, including, but not limited to, those Documents Concerning the Okada Holdings
6 Takeover.

7 **OBJECTIONS AND RESPONSE:**

8 Plaintiff incorporates each of its General Objections and Objections to Definitions and
9 Instructions as if fully set forth herein.

10 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
11 which are subject to more than one reasonable interpretation: “all Documents Concerning” and
12 “communications.” Plaintiff will undertake to interpret these terms as they would in ordinary usage
13 given the context. Plaintiff objects to this request as overly broad and unduly burdensome
14 inasmuch as it purports to request the production of “all” or “each and every” document in the
15 requested category of documents. Such a request for all documents is unduly burdensome in
16 particular given the extremely broad definitions of “Document” supplied by Defendants and,
17 consequently, the request purports to require Plaintiff to collect documents from potentially every
18 employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects
19 responsive documents from a reasonable list of custodians whose job responsibilities would indicate
20 that they were in possession of potentially responsive information. Plaintiff objects to this request
21 to the extent it purports to request the production of information subject to the attorney-client
22 privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff
23 objects to this request to the extent it purports to request information that is neither relevant to the
24 subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible
25 evidence.

26 Plaintiff objects to this request to the extent it purports to request information that is in the
27 possession, custody or control of third parties to this lawsuit and not within the possession, custody
28 and control of Plaintiff. Plaintiff objects to this request to the extent that it purports to request

1 information that is outside of the possession, custody or control of Plaintiff.

2 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
3 search, Plaintiff will produce responsive, non-privileged information within its custody and control
4 to the extent that such information exists.

5
6 **REQUEST NO. 119:**

7 Please produce all Documents Concerning communications between Mr. Fujimoto, or anyone on
8 his behalf, and Hiromi Okada from January 1, 2017 to the present.

9 **OBJECTIONS AND RESPONSE:**

10 Plaintiff incorporates each of its General Objections and Objections to Definitions and
11 Instructions as if fully set forth herein.

12 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
13 which are subject to more than one reasonable interpretation: "all Documents Concerning" and
14 "communications." Plaintiff will undertake to interpret these terms as they would in ordinary usage
15 given the context. Plaintiff objects to this request as overly broad and unduly burdensome
16 inasmuch as it purports to request the production of "all" or "each and every" document in the
17 requested category of documents. Such a request for all documents is unduly burdensome in
18 particular given the extremely broad definitions of "Document" supplied by Defendants and,
19 consequently, the request purports to require Plaintiff to collect documents from potentially every
20 employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects
21 responsive documents from a reasonable list of custodians whose job responsibilities would indicate
22 that they were in possession of potentially responsive information. Plaintiff objects to this request
23 to the extent it purports to request the production of information subject to the attorney-client
24 privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff
25 objects to this request to the extent it purports to request information that is neither relevant to the
26 subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible
27 evidence. Plaintiff objects to this request to the extent it purports to request information that is in
28 the possession, custody or control of third parties to this lawsuit and not within the possession,

1 custody and control of Plaintiff.

2 Plaintiff objects to this request to the extent that it purports to request information that is outside of
3 the possession, custody or control of Plaintiff.

4 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
5 search, Plaintiff will produce responsive, non-privileged information within its custody and control
6 to the extent that such information exists.

7
8 **REQUEST NO. 120:**

9 Please produce all Documents Concerning communications between UEC, or anyone on its behalf,
10 and Hiromi Okada from January 1, 2017 to the present.

11 **OBJECTIONS AND RESPONSE:**

12 Plaintiff incorporates each of its General Objections and Objections to Definitions and
13 Instructions as if fully set forth herein.

14 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
15 which are subject to more than one reasonable interpretation: "all Documents Concerning" and
16 "communications." Plaintiff objects to this request as overly broad and unduly burdensome
17 inasmuch as it purports to request the production of "all" or "each and every" document in the
18 requested category of documents. Such a request for all documents is unduly burdensome in
19 particular given the extremely broad definitions of "Document" supplied by Defendants and,
20 consequently, the request purports to require Plaintiff to collect documents from potentially every
21 employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects
22 responsive documents from a reasonable list of custodians whose job responsibilities would indicate
23 that they were in possession of potentially responsive information. Plaintiff objects to this request
24 to the extent it purports to request the production of information subject to the attorney-client
25 privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff
26 objects to this request to the extent it purports to request information that is neither relevant to the
27 subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible
28 evidence. Plaintiff objects to this request to the extent it purports to request information that is in

1 the possession, custody or control of third parties to this lawsuit and not within the possession,
2 custody and control of Plaintiff. Plaintiff objects to this request to the extent that it purports to
3 request information that is outside of the possession, custody or control of Plaintiff.

4 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
5 search, Plaintiff will produce responsive, non-privileged information within its custody and control
6 to the extent that such information exists.

7
8 **REQUEST NO. 121:**

9 Please produce all Documents that specifically reference Hiromi Okada (including but not limited to
10 Documents containing her name in Japanese) from January 1, 2017 to the present.

11 **OBJECTIONS AND RESPONSE:**

12 Plaintiff incorporates each of its General Objections and Objections to Definitions and
13 Instructions as if fully set forth herein.

14 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
15 which are subject to more than one reasonable interpretation: "all Documents Concerning" and
16 "communications." Plaintiff will undertake to interpret these terms as they would in ordinary usage
17 given the context. Plaintiff objects to this request as overly broad and unduly burdensome
18 inasmuch as it purports to request the production of "all" or "each and every" document in the
19 requested category of documents. Such a request for all documents is unduly burdensome in
20 particular given the extremely broad definitions of "Document" supplied by Defendants and,
21 consequently, the request purports to require Plaintiff to collect documents from potentially every
22 employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects
23 responsive documents from a reasonable list of custodians whose job responsibilities would indicate
24 that they were in possession of potentially responsive information. Plaintiff objects to this request
25 to the extent it purports to request the production of information subject to the attorney-client
26 privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff
27 objects to this request to the extent it purports to request information that is neither relevant to the
28 subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible

1 evidence.

2 Plaintiff objects to this request to the extent it purports to request information that is in the
3 possession, custody or control of third parties to this lawsuit and not within the possession, custody
4 and control of Plaintiff. Plaintiff objects to this request to the extent that it purports to request
5 information that is outside of the possession, custody or control of Plaintiff.

6 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
7 search, Plaintiff will produce responsive, non-privileged information within its custody and control
8 to the extent that such information exists.

9
10 **REQUEST NO. 122:**

11 In a UEC Press Release dated May 31, 2017 entitled "Proposed Change of Board members," it
12 states that UEC has "received notice from Okada Holdings Limited which owns 67.90% of the
13 voting rights of the Company, stating its intention to approve the proposed candidates for Directors
14 as listed above at the 44th Ordinary General Meeting of Shareholders." Please produce a copy of all
15 Documents Concerning this notice that UEC received from Okada Holdings.

16 **OBJECTIONS AND RESPONSE:**

17 Plaintiff incorporates each of its General Objections and Objections to Definitions and
18 Instructions as if fully set forth herein.

19 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
20 which are subject to more than one reasonable interpretation: "all Documents Concerning this
21 notice." Plaintiff will undertake to interpret these terms as they would in ordinary usage given the
22 context. Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it
23 purports to request the production of "all" or "each and every" document in the requested category
24 of documents. Such a request for all documents is unduly burdensome in particular given the
25 extremely broad definitions of "Document" supplied by Defendants and, consequently, the request
26 purports to require Plaintiff to collect documents from potentially every employee, agent or attorney
27 of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a
28 reasonable list of custodians whose job responsibilities would indicate that they were in possession

1 of potentially responsive information. Plaintiff objects to this request to the extent it purports to
2 request the production of information subject to the attorney-client privilege, the work product
3 doctrine or any other recognized privilege or immunity. Plaintiff objects to this request to the
4 extent it purports to request information that is neither relevant to the subject matter of this lawsuit
5 nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff objects to this
6 request to the extent it purports to request information that is in the possession, custody or control of
7 third parties to this lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff
8 objects to this request to the extent that it purports to request information that is outside of the
9 possession, custody or control of Plaintiff.

10 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
11 search, Plaintiff will produce responsive, non-privileged information within its custody and control
12 to the extent that such information exists.

13
14 **REQUEST NO. 123:**

15 From January 1, 2017 to present, please produce all Documents Concerning communications
16 between UEC (or person or entity on its behalf) and any government organizations (including but
17 not limited to the Hong Kong Independent Commission Against Corruption) Concerning allegations
18 that Mr. Okada has engaged in any improper or illegal activities.

19 **OBJECTIONS AND RESPONSE:**

20 Plaintiff incorporates each of its General Objections and Objections to Definitions and
21 Instructions as if fully set forth herein.

22 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
23 which are subject to more than one reasonable interpretation: "all Documents Concerning" and
24 "communications." Plaintiff will undertake to interpret these terms as they would in ordinary usage
25 given the context. Plaintiff objects to this request as overly broad and unduly burdensome
26 inasmuch as it purports to request the production of "all" or "each and every" document in the
27 requested category of documents. Such a request for all documents is unduly burdensome in
28 particular given the extremely broad definitions of "Document" supplied by Defendants and,

1 consequently, the request purports to require Plaintiff to collect documents from potentially every
2 employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects
3 responsive documents from a reasonable list of custodians whose job responsibilities would indicate
4 that they were in possession of potentially responsive information. Plaintiff objects to this request
5 to the extent it purports to request the production of information subject to the attorney-client
6 privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff
7 objects to this request to the extent it purports to request information that is neither relevant to the
8 subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible
9 evidence. Plaintiff objects to this request to the extent it purports to request information that is in
10 the possession, custody or control of third parties to this lawsuit and not within the possession,
11 custody and control of Plaintiff.

12 Plaintiff objects to this request to the extent that it purports to request information that is outside of
13 the possession, custody or control of Plaintiff.

14 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
15 search, Plaintiff will produce responsive, non-privileged information within its custody and control
16 to the extent that such information exists.

17
18 **REQUEST NO. 124:**

19 From January 1, 2017 to present, please produce all Documents Concerning legal filings by UEC
20 (or person or entity on its behalf) Concerning allegations that Mr. Okada has engaged in any
21 improper or illegal activities.

22 **OBJECTIONS AND RESPONSE:**

23 Plaintiff incorporates each of its General Objections and Objections to Definitions and
24 Instructions as if fully set forth herein.

25 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
26 which are subject to more than one reasonable interpretation: "all Documents Concerning legal
27 filings." Plaintiff will undertake to interpret these terms as they would in ordinary usage given the
28 context. Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it

purports to request the production of “all” or “each and every” document in the requested category of documents. Such a request for all documents is unduly burdensome in particular given the extremely broad definitions of “Document” supplied by Defendants and, consequently, the request purports to require Plaintiff to collect documents from potentially every employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a reasonable list of custodians whose job responsibilities would indicate that they were in possession of potentially responsive information. Plaintiff objects to this request to the extent it purports to request the production of information subject to the attorney-client privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff objects to this request to the extent it purports to request information that is neither relevant to the subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff objects to this request to the extent it purports to request information that is in the possession, custody or control of third parties to this lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff objects to this request to the extent that it purports to request information that is outside of the possession, custody or control of Plaintiff.

Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and search, Plaintiff will produce responsive, non-privileged information within its custody and control to the extent that such information exists.

REQUEST NO. 125:

From January 1, 2011 to present, please produce all Documents concerning any UEC resolutions (including but not limited to any UEC written corporate resolutions involving Tiger Resorts Asia Limited) Concerning allegations contained in the report by the Special Investigation Committee which is referenced in paragraph 68 of the Second Amended Complaint.

OBJECTIONS AND RESPONSE:

Plaintiff incorporates each of its General Objections and Objections to Definitions and Instructions as if fully set forth herein.

Plaintiff objects to this request as vague and ambiguous in its use of the following terms,

1 which are subject to more than one reasonable interpretation: “all Documents
2 concerning.” Plaintiff will undertake to interpret these terms as they would in ordinary usage given
3 the context. Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it
4 purports to request the production of “all” or “each and every” document in the requested category
5 of documents. Such a request for all documents is unduly burdensome in particular given the
6 extremely broad definitions of “Document” supplied by Defendants and, consequently, the request
7 purports to require Plaintiff to collect documents from potentially every employee, agent or attorney
8 of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a
9 reasonable list of custodians whose job responsibilities would indicate that they were in possession
10 of potentially responsive information. Plaintiff objects to this request to the extent it purports to
11 request the production of information subject to the attorney-client privilege, the work product
12 doctrine or any other recognized privilege or immunity. Plaintiff objects to this request to the
13 extent it purports to request information that is neither relevant to the subject matter of this lawsuit
14 nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff objects to this
15 request to the extent it purports to request information that is in the possession, custody or control of
16 third parties to this lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff
17 objects to this request to the extent it purports to request information that is within the public
18 domain and accordingly is at least as easily obtained by the Defendants. Plaintiff objects to this
19 request to the extent that it is not reasonably limited to a time period relevant to the causes of action
20 and claims at issue in this lawsuit.

21 Plaintiff objects to this request to the extent that it purports to request information that is outside of
22 the possession, custody or control of Plaintiff. Plaintiff objects to this request as overly
23 burdensome to the extent it purports to request documents that are, or should be, within the
24 possession custody and control of one or more of the Defendants. Plaintiff objects to this request
25 as overly burdensome to the extent it purports to duplicate or overlap in subject matter with other
26 requests propounded by the Defendants.

27 Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and
28 search, Plaintiff will produce responsive, non-privileged information within its custody and control

1 to the extent that such information exists.

2
3 ***UEC Financials/Board Compensation***

4 **REQUEST NO. 126:**

5 Per a statement from Mr. Yoshinao Negishi, dated June 23, 2017, it states that “with respect to the
6 compensation for directors of UE, UE has a prescribed calculation standard for performance-linked
7 compensation. After reappointment of a director at the shareholder’s general meeting of UE held in
8 June of every year, the amount of compensation to be paid to a director is determined based on the
9 performance of the previous business year according to this standard.” Please produce a copy of any
10 Documents Concerning this UEC director compensation standard from January 1, 2015 to present.

11 **OBJECTIONS AND RESPONSE:**

12 Plaintiff incorporates each of its General Objections and Objections to Definitions and
13 Instructions as if fully set forth herein.

14 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
15 which are subject to more than one reasonable interpretation: “any Documents
16 Concerning.” Plaintiff will undertake to interpret these terms as they would in ordinary usage given
17 the context. Plaintiff objects to this request to the extent it purports to request the production of
18 information subject to the attorney-client privilege, the work product doctrine or any other
19 recognized privilege or immunity.

20 Plaintiff objects to this request to the extent it purports to request information that is neither relevant
21 to the subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible
22 evidence. Plaintiff objects to this request to the extent it purports to request information that is in
23 the possession, custody or control of third parties to this lawsuit and not within the possession,
24 custody and control of Plaintiff. Plaintiff objects to this request to the extent that it purports to
25 request information that is outside of the possession, custody or control of Plaintiff. Plaintiff
26 objects to this request as overly burdensome to the extent it purports to request documents that are,
27 or should be, within the possession custody and control of one or more of the Defendants.

28 Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and

1 search, Plaintiff will produce responsive, non-privileged information within its custody and control
2 to the extent that such information exists.

3
4 **REQUEST NO. 127:**

5 Please produce all Documents showing the compensation paid by UEC to Mr. Fujimoto from
6 January 1, 2015 to the present.

7 **OBJECTIONS AND RESPONSE:**

8 Plaintiff incorporates each of its General Objections and Objections to Definitions and
9 Instructions as if fully set forth herein.

10 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
11 which are subject to more than one reasonable interpretation: “all Documents showing.” Plaintiff
12 will undertake to interpret these terms as they would in ordinary usage given the context. Plaintiff
13 objects to this request as overly broad and unduly burdensome inasmuch as it purports to request the
14 production of “all” or “each and every” document in the requested category of documents. Such a
15 request for all documents is unduly burdensome in particular given the extremely broad definitions
16 of “Document” supplied by Defendants and, consequently, the request purports to require Plaintiff
17 to collect documents from potentially every employee, agent or attorney of Plaintiff rather than
18 conduct a reasonable investigation that collects responsive documents from a reasonable list of
19 custodians whose job responsibilities would indicate that they were in possession of potentially
20 responsive information. Plaintiff objects to this request to the extent it purports to request
21 information that is neither relevant to the subject matter of this lawsuit nor reasonably calculated to
22 lead to the discovery of admissible evidence. Plaintiff objects to this request to the extent it
23 purports to request information that is in the possession, custody or control of third parties to this
24 lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff objects to this
25 request to the extent it purports to request information that is within the public domain and
26 accordingly is at least as easily obtained by the Defendants. Plaintiff objects to this request to the
27 extent that it purports to request information that is outside of the possession, custody or control of
28 Plaintiff.

1 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
2 search, Plaintiff will produce responsive, non-privileged information within its custody and control
3 to the extent that such information exists.

4
5 **REQUEST NO. 128:**

6 Please produce all Documents showing the compensation paid by UEC to Mr. Hajime Tokuda from
7 January 1, 2015 to the present.

8 **OBJECTIONS AND RESPONSE:**

9 Plaintiff incorporates each of its General Objections and Objections to Definitions and
10 Instructions as if fully set forth herein.

11 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
12 which are subject to more than one reasonable interpretation: "all Documents showing." Plaintiff
13 will undertake to interpret these terms as they would in ordinary usage given the context. Plaintiff
14 objects to this request as overly broad and unduly burdensome inasmuch as it purports to request the
15 production of "all" or "each and every" document in the requested category of documents. Such a
16 request for all documents is unduly burdensome in particular given the extremely broad definitions
17 of "Document" supplied by Defendants and, consequently, the request purports to require Plaintiff
18 to collect documents from potentially every employee, agent or attorney of Plaintiff rather than
19 conduct a reasonable investigation that collects responsive documents from a reasonable list of
20 custodians whose job responsibilities would indicate that they were in possession of potentially
21 responsive information. Plaintiff objects to this request to the extent it purports to request
22 information that is neither relevant to the subject matter of this lawsuit nor reasonably calculated to
23 lead to the discovery of admissible evidence. Plaintiff objects to this request to the extent it
24 purports to request information that is in the possession, custody or control of third parties to this
25 lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff objects to this
26 request to the extent it purports to request information that is within the public domain and
27 accordingly is at least as easily obtained by the Defendants. Plaintiff objects to this request to the
28 extent that it purports to request information that is outside of the possession, custody or control of

1 Plaintiff.

2 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
3 search, Plaintiff will produce responsive, non-privileged information within its custody and control
4 to the extent that such information exists.

5
6 **REQUEST NO. 129:**

7 Please produce all Documents showing the compensation paid by UEC to Ms. Takako Okada from
8 January 1, 2015 to the present.

9 **OBJECTIONS AND RESPONSE:**

10 Plaintiff incorporates each of its General Objections and Objections to Definitions and
11 Instructions as if fully set forth herein.

12 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
13 which are subject to more than one reasonable interpretation: "all Documents showing." Plaintiff
14 will undertake to interpret these terms as they would in ordinary usage given the context. Plaintiff
15 objects to this request as overly broad and unduly burdensome inasmuch as it purports to request the
16 production of "all" or "each and every" document in the requested category of documents. Such a
17 request for all documents is unduly burdensome in particular given the extremely broad definitions
18 of "Document" supplied by Defendants and, consequently, the request purports to require Plaintiff
19 to collect documents from potentially every employee, agent or attorney of Plaintiff rather than
20 conduct a reasonable investigation that collects responsive documents from a reasonable list of
21 custodians whose job responsibilities would indicate that they were in possession of potentially
22 responsive information. Plaintiff objects to this request to the extent it purports to request
23 information that is neither relevant to the subject matter of this lawsuit nor reasonably calculated to
24 lead to the discovery of admissible evidence. Plaintiff objects to this request to the extent it
25 purports to request information that is in the possession, custody or control of third parties to this
26 lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff objects to this
27 request to the extent it purports to request information that is within the public domain and
28 accordingly is at least as easily obtained by the Defendants. Plaintiff objects to this request to the

1 extent that it purports to request information that is outside of the possession, custody or control of
2 Plaintiff.

3 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
4 search, Plaintiff will produce responsive, non-privileged information within its custody and control
5 to the extent that such information exists.

6
7 **REQUEST NO. 130:**

8 Please produce all Documents showing the compensation paid by UEC to Mr. Shimizu Kamigaki
9 from January 1, 2015 to the present.

10 **OBJECTIONS AND RESPONSE:**

11 Plaintiff incorporates each of its General Objections and Objections to Definitions and
12 Instructions as if fully set forth herein.

13 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
14 which are subject to more than one reasonable interpretation: "all Documents showing." Plaintiff
15 will undertake to interpret these terms as they would in ordinary usage given the context. Plaintiff
16 objects to this request as overly broad and unduly burdensome inasmuch as it purports to request the
17 production of "all" or "each and every" document in the requested category of documents. Such a
18 request for all documents is unduly burdensome in particular given the extremely broad definitions
19 of "Document" supplied by Defendants and, consequently, the request purports to require Plaintiff
20 to collect documents from potentially every employee, agent or attorney of Plaintiff rather than
21 conduct a reasonable investigation that collects responsive documents from a reasonable list of
22 custodians whose job responsibilities would indicate that they were in possession of potentially
23 responsive information. Plaintiff objects to this request to the extent it purports to request
24 information that is neither relevant to the subject matter of this lawsuit nor reasonably calculated to
25 lead to the discovery of admissible evidence. Plaintiff objects to this request to the extent it
26 purports to request information that is in the possession, custody or control of third parties to this
27 lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff objects to this
28 request to the extent it purports to request information that is within the public domain and

1 accordingly is at least as easily obtained by the Defendants. Plaintiff objects to this request to the
2 extent that it purports to request information that is outside of the possession, custody or control of
3 Plaintiff.

4 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
5 search, Plaintiff will produce responsive, non-privileged information within its custody and control
6 to the extent that such information exists.

7
8 **REQUEST NO. 131:**

9 Please produce all Documents showing the compensation paid by UEC to Mr. Yoshio Otani from
10 January 1, 2015 to the present.

11 **OBJECTIONS AND RESPONSE:**

12 Plaintiff incorporates each of its General Objections and Objections to Definitions and
13 Instructions as if fully set forth herein.

14 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
15 which are subject to more than one reasonable interpretation: "all Documents showing." Plaintiff
16 will undertake to interpret these terms as they would in ordinary usage given the context. Plaintiff
17 objects to this request as overly broad and unduly burdensome inasmuch as it purports to request the
18 production of "all" or "each and every" document in the requested category of documents. Such a
19 request for all documents is unduly burdensome in particular given the extremely broad definitions
20 of "Document" supplied by Defendants and, consequently, the request purports to require Plaintiff
21 to collect documents from potentially every employee, agent or attorney of Plaintiff rather than
22 conduct a reasonable investigation that collects responsive documents from a reasonable list of
23 custodians whose job responsibilities would indicate that they were in possession of potentially
24 responsive information. Plaintiff objects to this request to the extent it purports to request
25 information that is neither relevant to the subject matter of this lawsuit nor reasonably calculated to
26 lead to the discovery of admissible evidence. Plaintiff objects to this request to the extent it
27 purports to request information that is in the possession, custody or control of third parties to this
28 lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff objects to this

1 request to the extent it purports to request information that is within the public domain and
 2 accordingly is at least as easily obtained by the Defendants. Plaintiff objects to this request to the
 3 extent that it purports to request information that is outside of the possession, custody or control of
 4 Plaintiff.

5 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
 6 search, Plaintiff will produce responsive, non-privileged information within its custody and control
 7 to the extent that such information exists.

8
 9 **REQUEST NO. 132:**

10 Please produce all Documents showing the compensation paid by UEC to Mr. Yoshinao Negishi
 11 from January 1, 2015 to the present.

12 **OBJECTIONS AND RESPONSE:**

13 Plaintiff incorporates each of its General Objections and Objections to Definitions and
 14 Instructions as if fully set forth herein.

15 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
 16 which are subject to more than one reasonable interpretation: "all Documents showing." Plaintiff
 17 will undertake to interpret these terms as they would in ordinary usage given the context. Plaintiff
 18 objects to this request as overly broad and unduly burdensome inasmuch as it purports to request the
 19 production of "all" or "each and every" document in the requested category of documents. Such a
 20 request for all documents is unduly burdensome in particular given the extremely broad definitions
 21 of "Document" supplied by Defendants and, consequently, the request purports to require Plaintiff
 22 to collect documents from potentially every employee, agent or attorney of Plaintiff rather than
 23 conduct a reasonable investigation that collects responsive documents from a reasonable list of
 24 custodians whose job responsibilities would indicate that they were in possession of potentially
 25 responsive information. Plaintiff objects to this request to the extent it purports to request
 26 information that is neither relevant to the subject matter of this lawsuit nor reasonably calculated to
 27 lead to the discovery of admissible evidence. Plaintiff objects to this request to the extent it
 28 purports to request information that is in the possession, custody or control of third parties to this

lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff objects to this request to the extent it purports to request information that is within the public domain and accordingly is at least as easily obtained by the Defendants. Plaintiff objects to this request to the extent that it purports to request information that is outside of the possession, custody or control of Plaintiff.

Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and search, Plaintiff will produce responsive, non-privileged information within its custody and control to the extent that such information exists.

REQUEST NO. 133:

Please produce all Documents Concerning legal fees paid by UEC to lawyers for Tomohiro Okada from January 1, 2017 to present.

OBJECTIONS AND RESPONSE:

Plaintiff incorporates each of its General Objections and Objections to Definitions and Instructions as if fully set forth herein.

Plaintiff objects to this request as vague and ambiguous in its use of the following terms, which are subject to more than one reasonable interpretation: "all Documents Concerning." Plaintiff will undertake to interpret these terms as they would in ordinary usage given the context. Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it purports to request the production of "all" or "each and every" document in the requested category of documents. Such a request for all documents is unduly burdensome in particular given the extremely broad definitions of "Document" supplied by Defendants and, consequently, the request purports to require Plaintiff to collect documents from potentially every employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a reasonable list of custodians whose job responsibilities would indicate that they were in possession of potentially responsive information. Plaintiff objects to this request to the extent it purports to request the production of information subject to the attorney-client privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff objects to this request to the

1 extent it purports to request information that is neither relevant to the subject matter of this lawsuit
2 nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff objects to this
3 request to the extent it purports to request information that is in the possession, custody or control of
4 third parties to this lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff
5 objects to this request to the extent that it purports to request information that is outside of the
6 possession, custody or control of Plaintiff.

7 Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and
8 search, Plaintiff will produce responsive, non-privileged information within its custody and control
9 to the extent that such information exists.

10
11 **REQUEST NO. 134:**

12 Please produce all Documents Concerning monies paid by UEC to Tomohiro Okada to reimburse
13 him for any costs, including any legal fees, incurred by him from January 1, 2017 to present.

14 **OBJECTIONS AND RESPONSE:**

15 Plaintiff incorporates each of its General Objections and Objections to Definitions and
16 Instructions as if fully set forth herein.

17 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
18 which are subject to more than one reasonable interpretation: "all Documents
19 Concerning." Plaintiff will undertake to interpret these terms as they would in ordinary usage given
20 the context.

21 Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it purports to
22 request the production of "all" or "each and every" document in the requested category of
23 documents. Such a request for all documents is unduly burdensome in particular given the
24 extremely broad definitions of "Document" supplied by Defendants and, consequently, the request
25 purports to require Plaintiff to collect documents from potentially every employee, agent or attorney
26 of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a
27 reasonable list of custodians whose job responsibilities would indicate that they were in possession
28 of potentially responsive information. Plaintiff objects to this request to the extent it purports to

request the production of information subject to the attorney-client privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff objects to this request to the extent it purports to request information that is neither relevant to the subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff objects to this request to the extent it purports to request information that is in the possession, custody or control of third parties to this lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff objects to this request to the extent that it purports to request information that is outside of the possession, custody or control of Plaintiff.

Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and search, Plaintiff will produce responsive, non-privileged information within its custody and control to the extent that such information exists.

Indemnification

REQUEST NO. 135:

Please produce all Documents Concerning communications between UEC and Wynn Resorts, Limited from January 29, 2017 to March 31, 2018 Concerning the Wynn Litigation.

OBJECTIONS AND RESPONSE:

Plaintiff incorporates each of its General Objections and Objections to Definitions and Instructions as if fully set forth herein.

Plaintiff objects to this request as vague and ambiguous in its use of the following terms, which are subject to more than one reasonable interpretation: "all Documents Concerning" and "communications." Plaintiff will undertake to interpret these terms as they would in ordinary usage given the context. Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it purports to request the production of "all" or "each and every" document in the requested category of documents. Such a request for all documents is unduly burdensome in particular given the extremely broad definitions of "Document" supplied by Defendants and, consequently, the request purports to require Plaintiff to collect documents from potentially every employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects

responsive documents from a reasonable list of custodians whose job responsibilities would indicate that they were in possession of potentially responsive information. Plaintiff objects to this request to the extent it purports to request the production of information subject to the attorney-client privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff objects to this request to the extent it purports to request information that is neither relevant to the subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff objects to this request to the extent it purports to request information that is in the possession, custody or control of third parties to this lawsuit and not within the possession, custody and control of Plaintiff.

Plaintiff objects to this request to the extent that it purports to request information that is outside of the possession, custody or control of Plaintiff. Plaintiff objects to this request as overly burdensome to the extent it purports to request documents that are, or should be, within the possession custody and control of one or more of the Defendants.

Subject to Plaintiff's above objections, after and pursuant to a reasonable investigation and search, Plaintiff will produce responsive, non-privileged information within its custody and control to the extent that such information exists.

REQUEST NO. 136:

Please produce all Documents Concerning indemnification by UEC and/or Aruze of Okada in the Wynn Litigation.

OBJECTIONS AND RESPONSE:

Plaintiff incorporates each of its General Objections and Objections to Definitions and Instructions as if fully set forth herein.

Plaintiff objects to this request as vague and ambiguous in its use of the following terms, which are subject to more than one reasonable interpretation: "all Documents Concerning" and "indemnification." Plaintiff will undertake to interpret these terms as they would in ordinary usage given the context. Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it purports to request the production of "all" or "each and every" document in the

1 requested category of documents. Such a request for all documents is unduly burdensome in
2 particular given the extremely broad definitions of “Document” supplied by Defendants and,
3 consequently, the request purports to require Plaintiff to collect documents from potentially every
4 employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects
5 responsive documents from a reasonable list of custodians whose job responsibilities would indicate
6 that they were in possession of potentially responsive information. Plaintiff objects to this request
7 to the extent it purports to request the production of information subject to the attorney-client
8 privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff
9 objects to this request to the extent it purports to request information that is neither relevant to the
10 subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible
11 evidence. Plaintiff objects to this request to the extent it purports to request information that is in
12 the possession, custody or control of third parties to this lawsuit and not within the possession,
13 custody and control of Plaintiff.
14 Plaintiff objects to this request to the extent that it purports to request information that is outside of
15 the possession, custody or control of Plaintiff. Plaintiff objects to this request to the extent it
16 requires a legal conclusion in order to interpret the request.

17 Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and
18 search, Plaintiff will produce responsive, non-privileged information within its custody and control
19 to the extent that such information exists.

20
21 **REQUEST NO. 137:**

22 Please produce all Documents Concerning payment by UEC or Aruze of legal fees incurred
23 by UEC or Aruze in the Wynn Litigation.

24 **OBJECTIONS AND RESPONSE:**

25 Plaintiff incorporates each of its General Objections and Objections to Definitions and
26 Instructions as if fully set forth herein.

27 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
28 which are subject to more than one reasonable interpretation: “all Documents

Concerning.” Plaintiff will undertake to interpret these terms as they would in ordinary usage given the context. Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it purports to request the production of “all” or “each and every” document in the requested category of documents. Such a request for all documents is unduly burdensome in particular given the extremely broad definitions of “Document” supplied by Defendants and, consequently, the request purports to require Plaintiff to collect documents from potentially every employee, agent or attorney of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a reasonable list of custodians whose job responsibilities would indicate that they were in possession of potentially responsive information. Plaintiff objects to this request to the extent it purports to request the production of information subject to the attorney-client privilege, the work product doctrine or any other recognized privilege or immunity. Plaintiff objects to this request to the extent it purports to request information that is neither relevant to the subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff objects to this request to the extent it purports to request information that is in the possession, custody or control of third parties to this lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff objects to this request to the extent that it purports to request information that is outside of the possession, custody or control of Plaintiff. Plaintiff objects to this request to the extent that it is not reasonably limited to a time period relevant to the causes of action and claims at issue in this lawsuit.

Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and search, Plaintiff will produce responsive, non-privileged information within its custody and control to the extent that such information exists.

REQUEST NO. 138:

Please produce all Documents Concerning payment by UEC or Aruze of legal fees incurred by Okada in the Wynn Litigation.

OBJECTIONS AND RESPONSE:

Plaintiff incorporates each of its General Objections and Objections to Definitions and

1 Instructions as if fully set forth herein.

2 Plaintiff objects to this request as vague and ambiguous in its use of the following terms,
3 which are subject to more than one reasonable interpretation: “all Documents
4 Concerning.” Plaintiff will undertake to interpret these terms as they would in ordinary usage given
5 the context. Plaintiff objects to this request as overly broad and unduly burdensome inasmuch as it
6 purports to request the production of “all” or “each and every” document in the requested category
7 of documents. Such a request for all documents is unduly burdensome in particular given the
8 extremely broad definitions of “Document” supplied by Defendants and, consequently, the request
9 purports to require Plaintiff to collect documents from potentially every employee, agent or attorney
10 of Plaintiff rather than conduct a reasonable investigation that collects responsive documents from a
11 reasonable list of custodians whose job responsibilities would indicate that they were in possession
12 of potentially responsive information. Plaintiff objects to this request to the extent it purports to
13 request the production of information subject to the attorney-client privilege, the work product
14 doctrine or any other recognized privilege or immunity. Plaintiff objects to this request to the
15 extent it purports to request information that is neither relevant to the subject matter of this lawsuit
16 nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff objects to this
17 request to the extent it purports to request information that is in the possession, custody or control of
18 third parties to this lawsuit and not within the possession, custody and control of Plaintiff. Plaintiff
19 objects to this request to the extent that it purports to request information that is outside of the
20 possession, custody or control of Plaintiff. Plaintiff objects to this request to the extent that it is not
21 reasonably limited to a time period relevant to the causes of action and claims at issue in this
22 lawsuit.

23 Subject to Plaintiff’s above objections, after and pursuant to a reasonable investigation and
24 search, Plaintiff will produce responsive, non-privileged information within its custody and control
25 to the extent that such information exists.

1 RESPECTFULLY SUBMITTED this 29th day of October, 2018.

2
3 By: /s/ Andrew Z. Weaver

4 Jay J. Schutttert, Esq.

5 Nevada Bar No. 8656

6 David W. Gutke, Esq.

7 Nevada Bar No. 9820

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20 ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I certify that on the 29th day of October, 2018, a true and correct copy of the foregoing
**PLAINTIFF'S OBJECTIONS AND RESPONSES TO DEFENDANTS' FIRST REQUESTS
FOR PRODUCTION OF DOCUMENTS (NOS. 1-138)** was served by the following method(s):

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